# **Iowa Department of Natural Resources Title V Operating Permit**

Name of Permitted Facility: PMX Industries, Inc. Facility Location: 5300 Willow Creek Drive SW

Cedar Rapids, IA 52404

Air Quality Operating Permit Number: 02-TV-022

**Expiration Date: October 3, 2007** 

**EIQ Number: 92-9186** 

Facility File Number: 57-01-095

#### **Responsible Official**

Name: Daniel R. Kowalczyk

Title: President, Chief Operating Officer

Mailing Address: 5300 Willow Creek Drive SW, Cedar Rapids, IA 52404

Phone #: (319) 368-7700

#### **Permit Contact Person for the Facility**

Name: Cynthia Stevenson **Title: Environmental Engineer** 

Mailing Address: 5300 Willow Creek Drive SW, Cedar Rapids, IA 52404

Phone #: (319) 368-7700

This permit is issued in accordance with 567 Iowa Administrative Code Chapter 22, and is issued subject to the terms and conditions contained in this permit.

#### For the Director of the Department of Natural Resources

Douglas A. Campbell, Supervisor of Air Operating Permits Section Date

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# **Abbreviations**

acfm	actual cubic feet per minute
	Code of Federal Regulation
CPV	Constant Pressure Valve
°F	degrees Fahrenheit
	emissions inventory questionnaire
	grains per dry standard cubic foot
	grains per one hundred cubic feet
_	Iowa Administrative Code
	Iowa Department of Natural Resources
	Linn County Public Health
	Linn County Ordinance
	motor vehicle air conditioner
	new source performance standard
	parts per million by volume
	parts per minion by volumepounds per hour
	pounds per million British thermal units
	standard cubic feet per minute
TPY	
USEPA	United States Environmental Protection Agency
<b>Pollutants</b>	
PM	particulate matter
	particulate matter ten microns or less in diameter
SO <sub>2</sub>	cultur diovida

 $SO_2$ .....sulfur dioxide NO<sub>x</sub> .....nitrogen oxides VOC .....volatile organic compound CO.....carbon monoxide HAP.....hazardous air pollutant

# I. Facility Description and Equipment List

Facility Name: PMX Industries, Inc.

Permit Number: 02-TV-022

Facility Description: Secondary Brass and Copper Production

# **Equipment List**

Emission	Associated	Associated Emission Unit Description
Point	Emission	
Number	Unit(s)	
	Number (s)	
105	601	<b>Electric Induction Furnace</b>
105	602	<b>Electric Induction Furnace</b>
105	604	<b>Electric Induction Furnace</b>
105	606	<b>Electric Induction Furnace</b>
105	607	<b>Electric Induction Furnace</b>
105	608	<b>Electric Induction Furnace</b>
105	611	<b>Electric Induction Furnace</b>
105	614	Electric Induction Furnace
105	615	Electric Induction Furnace
106	106	Algoma Finishing Mill
107	107	Sulfuric Acid Pickling of Copper and Brass Alloys
108	108	Two Stand Tandem Mill
113	113	Blaw Knox Rolling Mill
114	114	Sendzimer Cold Rolling Mill
120	120	Surface Milling Machine
121	121	Pneumatic Transfer of Milling Line Chips
122	122	<b>Abrasive Wheel Grinding of Cast Slabs</b>
124	124	Descaler Dry Brush
125	125	Acid Pickle Descaling Line
126	126	Cold Rolling Mill
127	127	10 Ebner Annealing Furnace Bases with 6 Heating Bells
		10 Ebner Annealing Furnace Bases with 6 Heating Bells,
127	127	<b>Natural Gas Combustion</b>
128	128	10 Ebner Annealing Furnace Bases with 6 Heating Bells
		10 Ebner Annealing Furnace Bases with 6 Heating Bells,
128	128	<b>Natural Gas Combustion</b>
129	129	Reheating Cast Copper and Brass Alloy Slabs
130	130	Natural Gas-Fired Emergency Generator – North
131	131	Natural Gas-Fired Emergency Generator - South

132	132	Diesel Powered Emergency Fire Pump
133	133	Acid Flux Application
133	133	Two Natural Gas Dryers for Tin Line
133	133	Production Tin Pot Natural Gas
133	133	Off-Line Tin Pot Natural Gas
133	133	Tinning
135	135	Diesel Emergency Generator
136	136	Diesel Emergency Generator
137	137	Diesel Emergency Generator
138	138	Diesel Emergency Generator
139	139	Diesel Emergency Generator
140	140	Continuous Annealing and Pickling Line #1
140	140	Continuous Annealing and Pickling Line #1 – Oven Dryer
141	141	Continuous Annealing and Pickling Line #2
141	141	Continuous Annealing and Pickling Line #2 – Oven Dryer
144	144	10 Ebner Annealing Furnace Bases with 6 Heating Bells
		10 Ebner Annealing Furnace Bases with 6 Heating Bells,
144	144	Natural Gas Combustion
145	145	Four Stand Tandem Mill
146	146	Degreasing Pickle Line
147	147	Roller Hearth
147	147	Roller Hearth, Natural Gas Combustion
148	148	10 Ebner Annealing Furnace Bases with 6 Heating Bells
		10 Ebner Annealing Furnace Bases with 6 Heating Bells,
148	148	Natural Gas Combustion
149	149	Bonding Mill – Dry Brushing
151	151	Cast Shop Central Vacuum System
1	1	Cast Shop Fugitives
1	1	Cast Shop Fugitives

# **Insignificant Equipment List**

Insignificant Emission Unit Number	Insignificant Emission Unit Description
	CAP Line #1 Immersion Heat
В	CAP Line #2 Immersion Heat
C	Slab Grinder Fugitive Emissions
D	Cast Shop Generator Fuel Tank #1
E	Cast Shop Generator Fuel Tank #2
F	Fuel Station – Diesel
G	Fuel Station – Kerosene
Н	Fuel Station – Gasoline
I	Used Oil Tank
K	Mobile Internal Combustion Equipment
L	Used Coolant Silo North
M	Used Coolant Silo South
N	Algoma Rolling Oil Tank
0	Fire Pump
P	Maintenance Welding Activities
Q	CAP Generator A
R	CAP Generator B
S	Facility Heating Equipment

# **II. Plant-Wide Conditions**

Facility Name: PMX Industries, Inc.

Permit Number: 02-TV-022

Permit conditions are established in accord with 567 Iowa Administrative Code rule 22.108

#### **Permit Duration**

The term of this permit is: less than 5 years

Commencing on: October 4, 2002 Ending on: October 3, 2007

Amendments, modifications and reopenings of the permit shall be obtained in accordance with 567 Iowa Administrative Code rules 22.110 - 22.114. Permits may be suspended, terminated, or revoked as specified in 567 Iowa Administrative Code Rules 22.115.

#### **Emission Limits**

Unless specified otherwise in the Source Specific Conditions, the following limitations and supporting regulations apply to all emission points at this plant:

Opacity (visible emissions): 20% opacity Authority for Requirement: LCO 10.7

Sulfur Dioxide (SO<sub>2</sub>): 500 parts per million by volume Authority for Requirement: 567 IAC 23.3(3)"e" LCO 10.12(2)

# <u>Particulate Matter (state enforceable only)</u><sup>1</sup>:

No person shall cause or allow the emission of particulate matter from any source in excess of the emission standards specified in this chapter, except as provided in 567 – Chapter 24. For sources constructed, modified or reconstructed after July 21, 1999, the emission of particulate matter from any process shall not exceed an emission standard of 0.1 grain per dry standard cubic foot of exhaust gas, except as provided in 567 – 21.2(455B), 23.1(455B), 23.4(455B) and 567 – Chapter 24.

For sources constructed, modified or reconstructed prior to July 21, 1999, the emission of particulate matter from any process shall not exceed the amount determined from Table I, or amount specified in a permit if based on an emission standard of 0.1 grain per standard cubic foot of exhaust gas or established from standards provided in 23.1(455B) and 23.4(455B). Authority for Requirement: 567 IAC 23.3(2)"a" (as revised 7/21/1999)

This is the current language in the Iowa Administrative Code (IAC). This version of the rule is awaiting EPA approval to become part of Iowa's State Implementation Plan (SIP). When EPA approves this rule, it will replace the older version and will be considered federally enforceable.

# Particulate Matter (federally enforceable)<sup>2</sup>:

The emission of particulate matter from any process shall not exceed the amount determined from Table I, except as provided in 567 — 21.2(455B), 23.1(455B), 23.4(455B) and 567 — Chapter 24. If the director determines that a process complying with the emission rates specified in Table I is causing or will cause air pollution in a specific area of the state, an emission standard of 0.1 grain per standard cubic foot of exhaust gas may be imposed. Authority for Requirement: 567 IAC 23.3(2)"a" (prior to 7/21/1999)

<u>Particulate Matter:</u> No person shall permit, cause, suffer or allow the emission of particulate matter into the atmosphere in any one hour from any emission point from any process equipment at a rate in excess of that specified in Table I for the process weight rate allocated to such emission point. The emission standards in LCO 10.9 (1)"a" shall apply and those specified in LCO 10.8 and 10.9 and Table I shall not apply to each process of the types listed in those sections, with the following exception: whenever the compliance status, history of operations, ambient air quality in the vicinity, or the type of control equipment utilized, would warrant maximum control, the Air Pollution Control Officer may enforce 0.1 grain per standard cubic foot of exhaust gas, or Table I of this section, whichever would result in the lowest allowable emission rate.

Authority for Requirement: LCO 10.9(1)

<u>Fugitive Dust:</u> Attainment and Unclassified Areas - No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered repaired or demolished, with the exception of farming operations or dust generated by ordinary travel on unpaved public roads, without taking reasonable precautions to prevent particulate matter in quantities sufficient to create a nuisance, as defined in Iowa Code section 657.1, from becoming airborne. All persons, with the above exceptions, shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate. The highway authority shall be responsible for taking corrective action in those cases where said authority has received complaints of or has actual knowledge of dust conditions which require abatement pursuant to this subrule. Reasonable precautions may include, but not limited to, the following procedures.

- 1. Use, where practical, of water or chemicals for control of dusts in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land.
- 2. Application of suitable materials, such as but not limited to asphalt, oil, water or chemicals on unpaved roads, material stockpiles, race tracks and other surfaces which can give rise to airborne dusts.
- 3. Installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials, such as but not limited to grain, fertilizers or limestone.
- 4. Covering at all times when in motion, open-bodied vehicles transporting materials likely to give rise to airborne dusts.
- 5. Prompt removal of earth or other material from paved streets or to which earth or other material has been transported by trucking or earth-moving equipment, erosion by water or other means.

<sup>&</sup>lt;sup>2</sup> This is the current language in the Iowa SIP, and is enforceable by EPA.

Authority for Requirement: 567 IAC 23.3(2)"c"

LCO 10.13

# **Compliance Plan**

The owner/operator shall comply with the applicable requirements listed below. The compliance status is based on information provided by the applicant.

Unless otherwise noted in Section III of this permit, PMX Industries, Inc. is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which become effective during the permit term, PMX Industries, Inc. shall comply with such requirements in a timely manner.

Authority for Requirement: 567 IAC 22.108(15)

# **III. Emission Point-Specific Conditions**

Facility Name: PMX Industries, Inc.

Permit Number: 02-TV-022

#### **Emission Point ID Number: 105**

#### Associated Equipment

Associated Emission Unit ID Numbers: 601, 602, 604, 606, 607, 608, 611, 614, 615

Emissions Control Equipment ID Number: 105

Emissions Control Equipment Description: Fabric Filter 16 Modules

# **Applicable Requirements**

Emission Unit vented through this Emission Point: 601 Emission Unit Description: Electric Induction Furnace

Raw Material/Fuel: Copper & Brass Alloys, Fluxes, Charcoal

Rated Capacity: 3.055 ton/hr

Emission Unit vented through this Emission Point: 602 Emission Unit Description: Electric Induction Furnace

Raw Material/Fuel: Copper & Brass Alloys, Fluxes, Charcoal

Rated Capacity: 3.055 ton/hr

Emission Unit vented through this Emission Point: 604 Emission Unit Description: Electric Induction Furnace

Raw Material/Fuel: Copper & Brass Alloys, Fluxes, Charcoal

Rated Capacity: 6.11 ton/hr

Emission Unit vented through this Emission Point: 606 Emission Unit Description: Electric Induction Furnace

Raw Material/Fuel: Copper & Brass Alloys, Fluxes, Charcoal

Rated Capacity: 3.055 ton/hr

Emission Unit vented through this Emission Point: 607 Emission Unit Description: Electric Induction Furnace

Raw Material/Fuel: Copper & Brass Alloys, Fluxes, Charcoal

Rated Capacity: 3.055 ton/hr

Emission Unit vented through this Emission Point: 608 Emission Unit Description: Electric Induction Furnace

Raw Material/Fuel: Copper & Brass Alloys, Fluxes, Charcoal

Rated Capacity: 3.055 ton/hr

Emission Unit vented through this Emission Point: 611 Emission Unit Description: Electric Induction Furnace

Raw Material/Fuel: Copper & Brass Alloys, Fluxes, Charcoal

Rated Capacity: 3.055 ton/hr

Emission Unit vented through this Emission Point: 614 Emission Unit Description: Electric Induction Furnace

Raw Material/Fuel: Copper & Brass Alloys, Fluxes, Charcoal

Rated Capacity: 3.055 ton/hr

Emission Unit vented through this Emission Point: 615 Emission Unit Description: Electric Induction Furnace

Raw Material/Fuel: Copper & Brass Alloys, Fluxes, Charcoal

Rated Capacity: 5.03 ton/hr

#### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit(s): 10%

Authority for Requirement: LCPH ATI 3424 / PTO 4247

Pollutant: PM-10

Emission Limit(s): 0.002 gr/dscf, 1.50 lb/hr, 6.57 tpy Authority for Requirement: LCPH ATI 3424 / PTO 4247

Pollutant: Particulate Matter

Emission Limit(s): 0.002 gr/dscf, 1.50 lb/hr, 6.57 tpy Authority for Requirement: LCPH ATI 3424 / PTO 4247

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)

Emission Limit(s): 0.76 lb/hr, 3.32 tpy

Authority for Requirement: LCPH ATI 3424 / PTO 4247

# **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### **Control Device:**

This source shall have a baghouse installed, operating, and maintained any time any of the cast shop furnaces are operated. Operation parameters for the control device delineated at the time of final source testing shall become a part of this permit condition. All appropriate probes and gauges needed to measure the parameters outlined in Compliance Monitoring and Record keeping shall be installed and maintained in a good operating condition.

Authority for Requirement: LCPH ATI 3424 / PTO 4247

#### **Operating Limits:**

The maximum operating capacity of all 4 stations combined is:

Holding and Melting Stations 1,2,3 & 5 210,000 ton/yr Exhaust Airflow Rate 84,499  $acfm \pm 20\%$ 

Airflow to the baghouse shall not exceed 84,499 acfm  $\pm$  20%. Any modification to the airflow would be considered a modification and would necessitate a new authorization to install permit. Authority for Requirement: LCPH ATI 3424 / PTO 4247

#### **Compliance Monitoring:**

The following information shall be monitored:

- Production of the cast shop stations shall be limited to 210,000 tons of copper, copper alloys and brass alloys cast a year based on a 12-month rolling average.
- Hours of operation for the baghouse based on a 12-month rolling average
- Weekly visual inspection of the baghouse exhaust and any seals for visible emissions shall be conducted. Any observation of visible emissions shall require repairs to the baghouse.
- Pressure drop across the baghouse shall be monitored and recorded daily. These recordings shall be maintained on site for a minimum of five years and shall be available for review by air pollution control personnel upon request.

Authority for Requirement: LCPH ATI 3424 / PTO 4247

#### **Compliance Testing:**

This source demonstrated compliance with the emission limits listed above by performing a certified stack test by methods described in 40 CFR 60, Appendix A, Method 5 on August 13, 1999.

Authority for Requirement: LCPH ATI 3424 / PTO 4247

#### **Record keeping Requirements:**

A log of operation shall be maintained for the operation of the above listed unit. The following information shall be recorded and kept on site for a period of no less than five years.

- Production of the cast shop stations shall be limited to 210,000 tons of copper, copper alloys and brass alloys cast a year based on a 12-month rolling average.
- Hours of operation for the baghouse based on a 12-month rolling average
- Weekly visual inspection of the baghouse exhaust and any seals for visible emissions shall be conducted. Any observation of visible emissions shall require repairs to the baghouse.

• Pressure drop across the baghouse shall be monitored and recorded daily. These recordings shall be maintained on site for a minimum of five years and shall be available for review by air pollution control personnel upon request.

Authority for Requirement: LCPH ATI 3424 / PTO 4247

#### **Reporting:**

Submit quarterly emissions report summarizing the following items by the 30<sup>th</sup> of each month for the previous quarter (January 30, April 30, July 30, and October 30).

- 1. Hours the baghouse operated based on a 12-month rolling average
- 2. Production rate of process rates for all metals based on a 12-month rolling average Authority for Requirement: LCPH ATI 3424 / PTO 4247

#### **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Stack testing not required at this time.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒ Facility Maintained Operation & Maintenance Plan Required? Yes ☒ No ☐

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated record keeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

# **Emission Point ID Number: 106**

#### Associated Equipment

Associated Emission Unit ID Numbers: 106 Emissions Control Equipment ID Number: 106

Emissions Control Equipment Description: 3 Stage Mist Eliminator

# **Applicable Requirements**

Emission Unit vented through this Emission Point: 106 Emission Unit Description: Algoma Finishing Mill

Raw Material/Fuel: UL-CR-17LV Oil

Rated Capacity: 7.92 ton/hr

### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit(s): 10%

Authority for Requirement: LCPH ATI 3552 / PTO 3722

Pollutant: PM-10

Emission Limit(s): 1.85 lb/hr, 8.1 tpy

Authority for Requirement: LCPH ATI 3552 / PTO 3722

Pollutant: Particulate Matter

Emission Limit(s): 1.85 lb/hr, 8.1 tpy

Authority for Requirement: LCPH ATI 3552 / PTO 3722

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### **Control Device:**

A series of filters shall be installed and maintained according to manufacturer specifications in order to control particulate emissions and visible opacity.

Authority for Requirement: LCPH ATI 3552 / PTO 3722

#### **Operation Limits:**

Rolling oils considered for use in emission points 106, 113 and 114 shall have a viscosity of 4.5-8.5 cSt at  $40^{\circ}$ C  $\pm$  10%. All proposed changes of rolling oil must first be approved by the Air

Quality Division, prior to use. Linn County Air Quality requests proposed changes in rolling oil be submitted in writing two weeks prior to any change of oil being implemented.

Authority for Requirement: LCPH ATI 3552 / PTO 3722

### **Record keeping Requirements:**

A log of operation shall be maintained for the operation of the above listed unit. As a minimum the following information shall be recorded and kept on site for a period of five years. These records shall be available at all times for viewing by air pollution control personnel.

- Record monthly usage of rolling lubricants
- Lubricant viscosity

Authority for Requirement: LCPH ATI 3552 / PTO 3722

#### **Reporting:**

• Submit lubricant viscosity changes two weeks prior to implementing any change.

Authority for Requirement: LCPH ATI 3552 / PTO 3722

#### **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Stack testing not required at this time.

#### **Opacity Monitoring:**

The facility shall check the opacity weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Opacity shall be observed to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required.

If an opacity >10 % is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Authority for Requirement: 567 IAC 22.108(13)

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ⊠	
Facility Maintained Operation & Maintenance Plan Required? Yes 🗌 No 🛭	3
Authority for Requirement: 567 IAC 22.108(3)"b"	

#### **Emission Point ID Number: 107**

#### Associated Equipment

Associated Emission Unit ID Numbers: 107 Emissions Control Equipment ID Number: 107 Emissions Control Equipment Description: Scrubber

# **Applicable Requirements**

Emission Unit vented through this Emission Point: 107

Emission Unit Description: Sulfuric Acid Pickling of Copper and Brass Alloys

Raw Material/Fuel: Sulfuric Acid Rated Capacity: 10.65 ton/hr

#### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit(s): 20%

Authority for Requirement: LCO 10.7

Pollutant: Particulate Matter

Emission Limit(s): 0.17 lb/hr, 0.75 tpy

Authority for Requirement: LCPH ATI 2694 / PTO 2606

#### **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Stack testing not required at this time.

#### **Opacity Monitoring:**

The facility shall check the opacity weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Opacity shall be observed to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required.

If an opacity >20 % is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If

weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Authority for Requirement: 567 IAC 22.108(13)

Agency Approved Operation & Maintenance Plan Required? Yes  $\square$  No  $\boxtimes$ 

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

**Emission Point ID Number: 108** 

Associated Equipment

Associated Emission Unit ID Numbers: 108

# **Applicable Requirements**

Emission Unit vented through this Emission Point: 108 Emission Unit Description: Two Stand Tandem Mill

Raw Material/Fuel: UL-PM-29 Rolling Oil

Rated Capacity: 29.32 ton/hr

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit(s): 20%

Authority for Requirement: LCPH ATI 3009 / PTO 3962

LCO 10.7

Pollutant: PM-10

Emission Limit(s): 3.01 lb/hr, 13.18 tpy

Authority for Requirement: LCPH ATI 3009 / PTO 3962

Pollutant: Particulate Matter Emission Limit(s): 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"(2)

LCO 10.9(1)"a"

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### **Operating Limits:**

Airflow to this source shall not exceed 33,500 scfm.

Authority for Requirement: LCPH ATI 3009 / PTO 3962

#### **Record keeping:**

The following items are to be recorded and available on site for review by air pollution control personnel upon request:

• Logbook of the amount of liquid PM rolling lubricants used in this process

Records shall be kept for no less than five years.

Authority for Requirement: LCPH ATI 3009 / PTO 3962

#### **Source Testing:**

Within 180 days of startup or 60 days of achieving maximum operating capacity a PM<sub>10</sub> source test shall be scheduled and completed. This test shall be conducted in accordance with 40 CFR Part 51, Appendix M, Method 201 or Method 201A with Method 202. The Air Pollution Control Officer shall approve alternative sampling procedures before sampling is conducted. Notification of proposed testing dates and a testing protocol must be submitted 15 days before such testing dates.

The above mentioned source demonstrated compliance through source testing in accordance with the Linn County Ordinance, Chapter 10, Sections 17, 18 and 19. On October 20, 1994, Interpoll Laboratories successfully completed the source test in accordance with EPA Methods 1-5, CFR Title 40, Part 60 Appendix A and wet catch samples were analyzed as per the Iowa DNR protocol.

Authority for Requirement: LCPH ATI 3009 / PTO 3962

#### **Reporting:**

• A yearly report of lubricants shall be sent to the Linn County Public Health Department Air Pollution Control Division by January 31 of the following year.

Authority for Requirement: LCPH ATI 3009 / PTO 3962

#### **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Stack testing not required at this time.

#### **Opacity Monitoring:**

The facility shall check the opacity weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Opacity shall be observed to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required.

If an opacity >20 % is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Authority for Requirement: 567 IAC 22.108(13)

Agency Approved Operation & Maintenance Plan Required? Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required? Yes $\square$ No $\boxtimes$
Authority for Requirement: 567 IAC 22.108(3)"b"

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#### **Emission Point ID Number: 113**

#### Associated Equipment

Associated Emission Unit ID Numbers: 113 Emissions Control Equipment ID Number: 113

Emissions Control Equipment Description: 3 Stage Mist Eliminator

# **Applicable Requirements**

Emission Unit vented through this Emission Point: 113 Emission Unit Description: Blaw Knox Rolling Mill

Raw Material/Fuel: UL-CR-18 Rolling Oil

Rated Capacity: 11.10 ton/hr

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit(s): 10%

Authority for Requirement: LCPH ATI 3574 / PTO 3723

Pollutant: PM-10

Emission Limit(s): 1.85 lb/hr, 8.1 tpy

Authority for Requirement: LCPH ATI 3574 / PTO 3723

Pollutant: Particulate Matter

Emission Limit(s): 1.85 lb/hr, 8.1 tpy

Authority for Requirement: LCPH ATI 3574 / PTO 3723

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### **Control Device:**

A series of filters shall be installed and maintained according to manufacturer specifications in order to control particulate emissions and visible opacity.

Authority for Requirement: LCPH ATI 3574 / PTO 3723

#### **Operation Limits:**

Rolling oils considered for use in emission points 106, 113, and 114 shall have a viscosity of 4.5 - 8.5 cSt at 40°C  $\pm$  10%. All proposed changes of rolling oil must first be approved by the Air Quality Division, prior to use. Linn County Air Quality requests proposed changes in rolling oil lubricant be submitted in writing two weeks prior to any change of oil being implemented.

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Authority for Requirement: LCPH ATI 3574 / PTO 3723

#### **Record keeping Requirements:**

A log of operation shall be maintained for the operation of the above listed unit. As a minimum the following information shall be recorded and kept on site for a period of five years. These records shall be available at all times for viewing by air pollution control personnel.

- Record monthly usage of rolling lubricants.
- Lubricant viscosity.

Authority for Requirement: LCPH ATI 3574 / PTO 3723

#### **Reporting:**

• Submit lubricant viscosity changes two weeks prior to implementing any change.

Authority for Requirement: LCPH ATI 3574 / PTO 3723

# **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Stack testing not required at this time.

#### **Opacity Monitoring:**

The facility shall check the opacity weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Opacity shall be observed to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required.

If an opacity >20 % is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Authority for Requirement: 567 IAC 22.108(13)

<b>Agency Approved Operation &amp; Maintenance Plan Required?</b> Yes ☐ No ☒
Facility Maintained Operation & Maintenance Plan Required? Yes . No
Authority for Requirement: 567 IAC 22.108(3)"b"

#### **Emission Point ID Number: 114**

#### Associated Equipment

Associated Emission Unit ID Numbers: 114 Emissions Control Equipment ID Number: 114

Emissions Control Equipment Description: 3 Stage Mist Eliminator

# **Applicable Requirements**

Emission Unit vented through this Emission Point: 114 Emission Unit Description: Sendzimer Cold Rolling Mill

Raw Material/Fuel: UL-CR-18 Rolling Oil

Rated Capacity: 11.10 ton/hr

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit(s): 10%

Authority for Requirement: LCPH ATI 3575 / PTO 3724

Pollutant: PM-10

Emission Limit(s): 1.85 lb/hr, 8.1 tpy

Authority for Requirement: LCPH ATI 3575 / PTO 3724

Pollutant: Particulate Matter

Emission Limit(s): 1.85 lb/hr, 8.1 tpy

Authority for Requirement: LCPH ATI 3575 / PTO 3724

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### **Control Device:**

A series of filters shall be installed and maintained according to manufacturer specifications in order to control particulate emissions and visible opacity.

Authority for Requirement: LCPH ATI 3575 / PTO 3724

#### **Operation Limits:**

Rolling oils considered for use in emission points 106, 113, and 114 shall have a viscosity of 4.5-8.5 cSt at  $40^{\circ}$ C  $\pm$  10%. All proposed changes of rolling oil must first be approved by the Air Quality Division, prior to use. Linn County Air Quality requests proposed changes in rolling oil lubricant be submitted in writing two weeks prior to any change of oil being implemented.

Authority for Requirement: LCPH ATI 3575 / PTO 3724

#### **Record keeping Requirements:**

A log of operation shall be maintained for the operation of the above listed unit. As a minimum the following information shall be recorded and kept on site for a period of five years. These records shall be available at all times for viewing by air pollution control personnel.

- Record monthly usage of rolling lubricants
- Lubricant viscosity

Authority for Requirement: LCPH ATI 3575 / PTO 3724

### **Reporting:**

• Submit lubricant viscosity changes two weeks prior to implementing any change. Authority for Requirement: LCPH ATI 3575 / PTO 3724

#### **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Stack testing not required at this time.

#### **Opacity Monitoring:**

The facility shall check the opacity weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Opacity shall be observed to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required.

If an opacity >10 % is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Authority for Requirement: 567 IAC 22.108(13)

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒
Facility Maintained Operation & Maintenance Plan Required? Yes $\square$ No $\boxtimes$
Authority for Requirement: 567 IAC 22.108(3)"b"

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#### **Emission Point ID Number: 120**

#### Associated Equipment

Associated Emission Unit ID Numbers: 120

Emissions Control Equipment ID Number: 120A, 120B, 120C

Emissions Control Equipment Description: Cyclone, Cyclone, Venturi Scrubber

# **Applicable Requirements**

Emission Unit vented through this Emission Point: 120 Emission Unit Description: Surface Milling Machine

Raw Material/Fuel: Copper and Brass Alloys

Rated Capacity: 26.71 ton/hr

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit(s): 10%

Authority for Requirement: LCPH ATI 3663 / PTO 3975

Pollutant: PM-10

Emission Limit(s): 0.408 lb/hr, 1.79 tpy

Authority for Requirement: LCPH ATI 3663 / PTO 3975

Pollutant: Particulate Matter Emission Limit(s): 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"(2)

LCO 10.9(1)"a"

# **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### **Control Device:**

- A wet scrubber and cyclones shall be used to control emissions. The control equipment shall be maintained on this source in a good operating condition at all times.
- Operation parameters for the control devices delineated at the time of final source testing shall become a part of these permit conditions. All appropriate probes and gauges needed to measure the parameters outlined under "Compliance Testing" shall be installed and maintained in a good operating condition.

Authority for Requirement: LCPH ATI 3663 / PTO 3975

#### **Compliance Testing:**

The above mentioned source demonstrated compliance through source testing in accordance with the Linn County Ordinance, Chapter 10, Sections 17, 18 and 19. On December 2, 1999, Interpoll Laboratories successfully completed the source test in accordance with EPA Methods 1-5, CFR Title 40, Part 60 Appendix A (revised July 1, 1999) and wet catch samples were analyzed as per Iowa DNR protocol.

Authority for Requirement: LCPH ATI 3663 / PTO 3975

#### **Monitoring Requirements:**

The following information shall be monitored:

- Daily pressure drop
- Daily scrubber water re-circulation rate
- Daily freshwater make up rate

All monitors shall be easily accessible to air pollution control personnel.

Authority for Requirement: LCPH ATI 3663 / PTO 3975

#### **Record keeping Requirements:**

A log of operation shall be maintained for the above listed unit. The following information shall be recorded and kept on site for a period of no less than five years.

- Daily pressure drop
- Daily scrubber water re-circulation rate
- Daily freshwater make-up rate
- Any changes in operation that would affect emissions, including changes in fan speed
- Records of all maintenance and repair completed on the control device
- Copies of test results shall be retained until a new approved representative test is conducted or for five years, whichever is longer.

These records shall be available on site at all times for viewing by air pollution control personnel.

Authority for Requirement: LCPH ATI 3663 / PTO 3975

# **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Stack testing not required at this time.

#### **Opacity Monitoring:**

The facility shall check the opacity weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Opacity shall be observed to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required.

If an opacity >10 % is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Authority for Requirement: 567 IAC 22.108(13)

# Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

# Facility Maintained Operation & Maintenance Plan Required? Yes ⊠ No □

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

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#### **Emission Point ID Number: 121**

#### Associated Equipment

Associated Emission Unit ID Numbers: 121 Emissions Control Equipment ID Number: 121 Emissions Control Equipment Description: Cyclone

# **Applicable Requirements**

Emission Unit vented through this Emission Point: 121

Emission Unit Description: Pneumatic Transfer of Milling Line Chips

Raw Material/Fuel: Copper and Brass Alloys

Rated Capacity: 0.24 MMCF/hr

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit(s): 10%

Authority for Requirement: LCPH ATI 3808 / PTO 3527

Pollutant: PM-10

Emission Limit(s): 0.30 lb/hr, 1.31 tpy

Authority for Requirement: LCPH ATI 3808 / PTO 3527

Pollutant: Particulate Matter Emission Limit(s): 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"(2)

LCO 10.9(1)"a"

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### **Operation Limits:**

Airflow shall not exceed 3531 cfm. The inertial separation device (cyclone) shall be maintained in proper working condition when the chip transfer system is operating.

Authority for Requirement: LCPH ATI 3808 / PTO 3527

#### **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Stack testing not required at this time.

#### **Opacity Monitoring:**

The facility shall check the opacity weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Opacity shall be observed to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required.

If an opacity >10 % is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Authority for Requirement: 567 IAC 22.108(13)

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes  $\boxtimes$  No  $\square$ 

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 122

### Associated Equipment

Associated Emission Unit ID Numbers: 122 Emissions Control Equipment ID Number: 122

Emissions Control Equipment Description: Fabric Filter

# **Applicable Requirements**

Emission Unit vented through this Emission Point: 122

Emission Unit Description: Abrasive Wheel Grinding of Cast Slabs

Raw Material/Fuel: Copper and Brass Alloys

Rated Capacity: 11.19 lb/hr

### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit(s): 20%

Authority for Requirement: LCO 10.7

Pollutant: Particulate Matter

Emission Limit(s): 0.64 lb/hr, 2.8 tpy

Authority for Requirement: LCPH ATI 2689 / PTO 2835

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### **Compliance Monitoring:**

This source shall install a pressure drop gauge to determine the pressure drop across the bags in the baghouse. This gauge should be operational at all times and be easily accessible to air pollution personnel.

Authority for Requirement: LCPH ATI 2689 / PTO 2835

#### **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Stack testing not required at this time.

#### **Opacity Monitoring:**

The facility shall check the opacity monthly during a period when the emission unit on this emission point is at or near full capacity and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Opacity shall be observed to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required.

If an opacity (>20 %) is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Authority for Requirement: 567 IAC 22.108(13)

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

#### **Emission Point ID Number: 124**

#### Associated Equipment

Associated Emission Unit ID Numbers: 124 Emissions Control Equipment ID Number: 124

Emissions Control Equipment Description: Fabric Filter

# **Applicable Requirements**

Emission Unit vented through this Emission Point: 124

Emission Unit Description: Descaler Dry Brush Raw Material/Fuel: Copper and Brass Alloys

Rated Capacity: 26.5 ton/hr

### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit(s): 20%

Authority for Requirement: LCPH ATI 3260 / PTO 3961

LCO 10.7

Pollutant: PM-10

Emission Limit(s): 1.96 lb/hr, 8.58 tpy

Authority for Requirement: LCPH ATI 3260 / PTO 3961

Pollutant: Particulate Matter Emission Limit(s): 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"(2)

LCO 10.9(1)"a"

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### **Control Device:**

A baghouse shall be installed, in good operating condition, and operating anytime the descaler is operating. A pressure drop gauge shall be installed to determine the pressure drop across the bags in the baghouse. This gauge shall be maintained in proper working condition and accessible to air pollution control personnel.

Authority for Requirement: LCPH ATI 3260 / PTO 3961

#### **Operating Limits:**

- This source shall be limited to a process rate not to exceed 53,000 lb/hr based on a 30 day rolling average.
- Airflow for the dust collector shall not exceed 34,000 dscfm.

Authority for Requirement: LCPH ATI 3260 / PTO 3961

#### **Record keeping Requirements:**

The following items are to be recorded and available on site for review by air pollution control personnel upon request:

• Monthly process rate of metal through descaler

Records shall be kept for no less than five years.

Authority for Requirement: LCPH ATI 3260 / PTO 3961

#### **Compliance Testing:**

The above mentioned source demonstrated compliance through source testing in accordance with the Linn County Ordinance, Chapter 10, Sections 17, 18 and 19. On June 14, 1995, Interpoll Laboratories successfully completed the source test in accordance with EPA Methods 1-5, CFR Title 40, Part 60 Appendix A and EPA Method 202 (CFR Title 40, Part 51, Appendix M). Authority for Requirement: LCPH ATI 3260 / PTO 3961

#### **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

#### **Stack Testing:**

Pollutant – Particulate Matter 1st Stack Test to be Completed by (date) – October 3, 2004 Test Method – Iowa Compliance Sampling Manual Authority for Requirement – 567 IAC 22.108(3)

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

#### **Opacity Monitoring:**

The facility shall check the opacity weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Opacity shall be observed to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required.

If an opacity >20 % is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Authority for Requirement: 567 IAC 22.108(13)

# Agency Approved Operation & Maintenance Plan Required? Yes $\square$ No $\boxtimes$

# Facility Maintained Operation & Maintenance Plan Required? Yes ⊠ No □

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

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#### **Emission Point ID Number: 125**

#### Associated Equipment

Associated Emission Unit ID Numbers: 125 Emissions Control Equipment ID Number: 125

Emissions Control Equipment Description: High Efficiency Wet Scrubber

# **Applicable Requirements**

Emission Unit vented through this Emission Point: 125 Emission Unit Description: Acid Pickle Descaling Line

Raw Material/Fuel: Sulfuric Acid Rated Capacity: 25.31 ton/hr

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit(s): 10%

Authority for Requirement: LCPH ATI 3168 / PTO 2987

Pollutant: PM-10

Emission Limit(s): 0.01 gr/dscf, 0.64 tpy

Authority for Requirement: LCPH ATI 3168 / PTO 2987

Pollutant: Particulate Matter Emission Limit(s): 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"(2)

LCO 10.9(1)"a"

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### **Control Device:**

This source shall maintain the scrubber in proper working condition anytime the descaling pickle is operating. On line flow meters shall be installed to monitor the flow of water to the scrubber. These meters shall be easily accessible to air pollution control personnel to verify water flow during compliance inspections of the facility.

Authority for Requirement: LCPH ATI 3168 / PTO 2987

#### **Operating Limits:**

This emission source shall be limited to a sulfuric acid pickling solution. Any other pickling solutions will require a new permit. Hours of operation of this source are not limited. Airflow from the stack shall not exceed 1700 dscfm. Any increase in airflow will require a new permit. Authority for Requirement: LCPH ATI 3168 / PTO 2987

#### **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Stack testing not required at this time.

#### **Opacity Monitoring:**

The facility shall check the opacity weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Opacity shall be observed to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required.

If an opacity >10 % is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Authority for Requirement: 567 IAC 22.108(13)

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒
Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ⊠
Authority for Requirement: 567 IAC 22.108(3)"b"

# **Emission Point ID Number: 126**

Associated Equipment

Associated Emission Unit ID Numbers: 126

# **Applicable Requirements**

Emission Unit vented through this Emission Point: 126

Emission Unit Description: Cold Rolling Mill Raw Material/Fuel: UL-CR-28, Coolant

Rated Capacity: 3 ton/hr

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit(s): 20%

Authority for Requirement: LCPH ATI 3008 / PTO 4059

Pollutant: PM-10

Emission Limit(s): 0.857 lb/hr, 3.75 tpy

Authority for Requirement: LCPH ATI 3008 / PTO 4059

Pollutant: Particulate Matter Emission Limit(s): 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"(2)

LCO 10.9(1)"a"

## **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

### **Operating Limits:**

Exhaust Airflow Rate: 10,000 dscfm ± 10%

An increase in airflow should be considered a modification and require a new authorization to

install permit.

Authority for Requirement: LCPH ATI 3008 / PTO 4059

#### **Record keeping:**

The following items are to be recorded and available on site for review by air pollution control personnel upon request:

• Logbook of the amount of liquid PM rolling lubricants used in this process.

Records shall be kept for no less than five years.

Authority for Requirement: LCPH ATI 3008 / PTO 4059

## **Reporting:**

• A yearly report of lubricants shall be sent to the Air Pollution Control Division by January 31 of the following year.

Authority for Requirement: LCPH ATI 3008 / PTO 4059

## **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

#### **Stack Testing:**

Pollutant – Particulate Matter 1st Stack Test to be Completed by (date) – October 3, 2004 Test Method – Iowa Compliance Sampling Manual Authority for Requirement – 567 IAC 22.108(3)

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

#### **Opacity Monitoring:**

The facility shall check the opacity weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Opacity shall be observed to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required.

If an opacity >20 % is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒
Facility Maintained Operation & Maintenance Plan Required? Yes $\square$ No $\boxtimes$
Authority for Requirement: 567 IAC 22.108(3)"b"

# **Emission Point ID Number: 127**

## Associated Equipment

Associated Emission Unit ID Numbers: 127 Emissions Control Equipment ID Number: 127 Emissions Control Equipment Description: Filters

# **Applicable Requirements**

Emission Unit vented through this Emission Point: 127

Emission Unit Description: 10 Ebner Annealing Furnace Bases with 6 Heating Bells

Raw Material/Fuel: Rolling Oil

Rated Capacity: 17.2 tons annealed/hr

Emission Unit vented through this Emission Point: 127

Emission Unit Description: 10 Ebner Annealing Bases with 6 Heating Bells

Raw Material/Fuel: Natural Gas Rated Capacity: 77.8 MMBtu/hr

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit(s): 5%

Authority for Requirement: LCPH ATI 3006 / PTO 3524

Pollutant: PM-10

Emission Limit(s): 0.038 lb/hr, 0.17 tpy

Authority for Requirement: LCPH ATI 3006 / PTO 3524

Pollutant: Particulate Matter Emission Limit(s): 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"(2)

LCO 10.9(1)"a"

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

# **Operation Limits:**

- Maintain filter elements in proper operating condition per manufacturers specifications.
- The annealing furnaces may be operated at the maximum designed manufacturers capacity at the time this permit was issued. Any change in furnace capacity or number of furnaces per bank will require new permits.

Authority for Requirement: LCPH ATI 3006 / PTO 3524

## **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Stack testing is not required at this time.

# **Opacity Monitoring:**

The facility shall check the opacity weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Opacity shall be observed to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required.

If an opacity >5 % is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Agency Approved Operation & Maintenance Plan Required? You	es 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes□ No⊠
Authority for Requirement: 567 IAC 22.108(3)"b"	

# **Emission Point ID Number: 128**

### Associated Equipment

Associated Emission Unit ID Numbers: 128 Emissions Control Equipment ID Number: 128 Emissions Control Equipment Description: Filters

# **Applicable Requirements**

Emission Unit vented through this Emission Point: 128

Emission Unit Description: 10 Ebner Annealing Furnace Bases with 6 Heating Bells

Raw Material/Fuel: Rolling Oil

Rated Capacity: 17.2 tons annealed/hr

Emission Unit vented through this Emission Point: 128

Emission Unit Description: 10 Ebner Annealing Furnace Bases with 6 Heating Bells

Raw Material/Fuel: Natural Gas Rated Capacity: 77.8 MMBtu/hr

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit(s): 5%

Authority for Requirement: LCPH ATI 3005 / PTO 3525

Pollutant: PM-10

Emission Limit(s): 0.038 lb/hr, 0.17 tpy

Authority for Requirement: LCPH ATI 3005 / PTO 3525

Pollutant: Particulate Matter Emission Limit(s): 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"(2)

LCO 10.9(1)"a"

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

# **Operation Limits:**

- Maintain filter elements in proper operating condition per manufacturers specifications.
- The annealing furnaces may be operated at the maximum designed manufacturers capacity at the time this permit is issued. Any change in the furnaces capacity or number of furnaces per bank will require new permits.

Authority for Requirement: LCPH ATI 3005 / PTO 3525

## **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Stack testing is not required at this time.

# **Opacity Monitoring:**

The facility shall check the opacity weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Opacity shall be observed to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required.

If an opacity >5 % is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒
Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☐
Authority for Requirement: 567 IAC 22.108(3)"b"

# **Emission Point ID Number: 129**

Associated Equipment

Associated Emission Unit ID Numbers: 129

# **Applicable Requirements**

Emission Unit vented through this Emission Point: 129

Emission Unit Description: Reheating Cast Copper and Brass Alloy Slabs

Raw Material/Fuel: Natural Gas Rated Capacity: 62745.1 cf/hr

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit(s): 20%

Authority for Requirement: LCPH ATI 3007 / PTO 2984

LCO 10.7

Pollutant: PM-10

Emission Limit(s): 0.48 lb/hr, 2.09 tpy

Authority for Requirement: LCPH ATI 3007 / PTO 2984

Pollutant: Particulate Matter

Emission Limit(s): 0.48 lb/hr, 2.09 tpy

Authority for Requirement: LCPH ATI 3007 / PTO 2984

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppmv

Authority for Requirement: 567 IAC 23.3(3)"e"

LCO 10.12(2)

### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

**Operating Limits:** 

Maximum Heat Input: 64 MMBtu/hr

Fuel Usage: Natural Gas Only

Authority for Requirement: LCPH ATI 3007 / PTO 2984

#### **Reporting Requirements:**

An annual report of natural gas consumption shall be submitted to the Linn County Air Pollution Control Division by January 31<sup>st</sup> for the previous years natural gas consumption.

Authority for Requirement: LCPH ATI 3007 / PTO 2984

# **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Stack testing not required at this time.

## **Opacity Monitoring:**

The facility shall check the opacity weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Opacity shall be observed to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required.

If an opacity >20 % is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Authority for Requirement: 567 IAC 22.108(13)

Agency Approved Operation & Maintenance Plan Required? Yes	No 🖂
Facility Maintained Operation & Maintenance Plan Required? Yes	□ No ⊠

**Emission Point ID Number: 130** Associated Equipment Associated Emission Unit ID Numbers: 130 **Applicable Requirements** Emission Unit vented through this Emission Point: 130 Emission Unit Description: Natural Gas Fired Emergency Generator - North Raw Material/Fuel: Natural Gas Rated Capacity: 0.00165 MMCF/hr Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.) The emissions from this emission point shall not exceed the levels specified below. Pollutant: Opacity Emission Limit(s): 20% Authority for Requirement: LCO 10.7 Pollutant: Particulate Matter Emission Limit(s): 0.6 lb/MMBtu Authority for Requirement: 567 IAC 23.3(2)"b"(2) LCO 10.8(2)"b" Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppmv Authority for Requirement: 567 IAC 23.3(3)"e" LCO 10.12(2) **Periodic Monitoring Requirements** *The owner/operator of this equipment shall comply with the periodic monitoring requirements* listed below. Stack testing is not required at this time. **Agency Approved Operation & Maintenance Plan Required?** Yes ☐ No ☒ Facility Maintained Operation & Maintenance Plan Required? Yes No 🛛

**Emission Point ID Number: 131** Associated Equipment Associated Emission Unit ID Numbers: 131 **Applicable Requirements** Emission Unit vented through this Emission Point: 131 Emission Unit Description: Natural Gas Fired Emergency Generator - South Raw Material/Fuel: Natural Gas Rated Capacity: 0.00165 MMCF/hr Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.) The emissions from this emission point shall not exceed the levels specified below. Pollutant: Opacity Emission Limit(s): 20% Authority for Requirement: LCO 10.7 Pollutant: Particulate Matter Emission Limit(s): 0.6 lb/MMBtu Authority for Requirement: 567 IAC 23.3(2)"b"(2) LCO 10.8(2)"b" Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppmv Authority for Requirement: 567 IAC 23.3(3)"e" LCO 10.12(2) **Periodic Monitoring Requirements** *The owner/operator of this equipment shall comply with the periodic monitoring requirements* listed below. Stack testing is not required at this time. **Agency Approved Operation & Maintenance Plan Required?** Yes ☐ No ☒ Facility Maintained Operation & Maintenance Plan Required? Yes No 🛛

# **Emission Point ID Number: 132**

Associated Equipment

Associated Emission Unit ID Numbers: 132

# **Applicable Requirements**

Emission Unit vented through this Emission Point: 132

Emission Unit Description: Diesel Powered Emergency Fire Pump

Raw Material/Fuel: Diesel Fuel Rated Capacity: 10.2 gal/hr

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit(s): 20%

Authority for Requirement: LCO 10.7

Pollutant: Particulate Matter Emission Limit(s): 0.6 lb/MMBtu

Authority for Requirement: 567 IAC 23.3(2)"b"(2)

LCO 10.8(2)"b"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 1.5 lb/MMBtu

Authority for Requirement: LCO 10.12(1)"b"

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

### **Process throughput:**

Fuel use shall be limits to number one or number two fuel oil with a maximum sulfur content of 0.5 percent by weight.

Authority for Requirement: 567 IAC 23.3(3)"b"(1)

LCO 10.12(1)"c"

#### **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Stack testing is not required at this time.

Agency Approved Operation & Maintenance Plan Required? Yes  No
Facility Maintained Operation & Maintenance Plan Required? Yes $\square$ No $\boxtimes$
Authority for Requirement: 567 IAC 22.108(3)"b"

# **Emission Point ID Number: 133**

### Associated Equipment

Associated Emission Unit ID Numbers: 133 Emissions Control Equipment ID Number: 133

Emissions Control Equipment Description: Packed Bed Scrubber

# **Applicable Requirements**

Emission Unit vented through this Emission Point: 133 Emission Unit Description: Acid Flux Application

Raw Material/Fuel: Hydrobromic Acid

Rated Capacity: 10.91 ton/hr

Emission Unit vented through this Emission Point: 133

Emission Unit Description: Two Natural Gas Dryers for Tin Line

Raw Material/Fuel: Natural Gas

Rated Capacity: 0.317 MMBtu/hr per dryer

Emission Unit vented through this Emission Point: 133 Emission Unit Description: Production Tin Pot Natural Gas

Raw Material/Fuel: Natural Gas Rated Capacity: 0.71 MMBtu/hr

Emission Unit vented through this Emission Point: 133 Emission Unit Description: Off-Line Tin Pot Natural Gas

Raw Material/Fuel: Natural Gas Rated Capacity: 0.35 MMBtu/hr

Emission Unit vented through this Emission Point: 133

Emission Unit Description: Tinning

Raw Material/Fuel: Tin Rated Capacity: 10.91 ton/hr

### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit(s): 10%

Authority for Requirement: LCPH ATI 3507 / PTO 3973

Pollutant: PM-10

Emission Limit(s): 1.37 lb/hr, 6.0 tpy

Authority for Requirement: LCPH ATI 3507 / PTO 3973

Pollutant: Particulate Matter Emission Limit(s): 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"(2)

LCO 10.9(1)"a"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppmv

Authority for Requirement: 567 IAC 23.3(3)"e"

LCO 10.12(2)

# **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### **Control Device:**

A packed bed water scrubber shall be installed, maintained and operated anytime the hot tin dip process is operated. A pressure drop gauge shall be installed across the scrubber. A gauge to measure water flow rates to the scrubber and the water flow re-circulation shall be installed. Authority for Requirement: LCPH ATI 3507 / PTO 3973

# **Operation Limits:**

Airflow to the scrubber shall not exceed 8000 dscfm. If this airflow is exceeded then a new authorization to install/modify permit is necessary. Minimum water flow rates shall be determined at the time of final compliance inspections and shall become a part of the permit to operate.

Authority for Requirement: LCPH ATI 3507 / PTO 3973

### **Monitoring Requirements:**

Daily monitoring of scrubber pressure drops, freshwater makeup, and water re-circulation rate.

Authority for Requirement: LCPH ATI 3507 / PTO 3973

#### **Record keeping Requirements:**

A log of operation shall be maintained for the operation of the scrubber. As a minimum the following information shall be recorded and kept on site for a period of five years. These records shall be available at all times for viewing by air pollution control personnel.

- Daily pressure drop readings
- Daily water re-circulation flow rate
- Daily freshwater makeup rate

Records shall be kept for no less than five years.

Authority for Requirement: LCPH ATI 3507 / PTO 3973

# **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Stack testing is not required at this time.

### **Opacity Monitoring:**

The facility shall check the opacity weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Opacity shall be observed to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required.

If an opacity >10 % is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Authority for Requirement: 567 IAC 22.108(13)

Agency Approved Operation & Maintenance Plan Required? Yes  $\square$  No  $\boxtimes$ 

Facility Maintained Operation & Maintenance Plan Required? Yes  $\boxtimes$  No  $\square$ 

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

# **Emission Point ID Number: 135**

### Associated Equipment

Associated Emission Unit ID Numbers: 135

# **Applicable Requirements**

Emission Unit vented through this Emission Point: 135 Emission Unit Description: Diesel Emergency Generator

Raw Material/Fuel: Diesel Fuel Rated Capacity: 121.9 gal/hr

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit(s): 20%

Authority for Requirement: LCPH ATI 3356 / PTO 3363

LCO 10.7

Pollutant: PM-10

Emission Limit(s): 2.4 lb/hr, 0.18 tpy

Authority for Requirement: LCPH ATI 3356 / PTO 3363

Pollutant: Particulate Matter

Emission Limit(s): 2.4 lb/hr, 0.18 tpy

Authority for Requirement: LCPH ATI 3356 / PTO 3363

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 0.65 tpy

Authority for Requirement: LCPH ATI 3356 / PTO 3363

Pollutant: Nitrogen Oxide (NO<sub>x</sub>)

Emission Limit(s): 54.7 lb/hr, 4.10 tpy

Authority for Requirement: LCPH ATI 3356 / PTO 3363

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

# **Operation Limits:**

- Maximum fuel usage: 121.9 gallons/hr
- This source shall be limited to 18,285 gallons of diesel fuel per year calculated on a 12-month rolling average.
- Fuel use in this unit shall be either #1 or #2 grade diesel fuel only, with a maximum sulfur content of 0.5% sulfur by weight.

Authority for Requirement: LCPH ATI 3356 / PTO 3363

### **Record keeping Requirements:**

A monthly log of operation shall be maintained for the operation of the above listed unit. As a minimum the following information shall be recorded and kept on site for a period of five years. These records shall be available at all times for viewing by air pollution control personnel.

- Total gallons of fuel combusted calculated monthly using a 12-month rolling average.
- Purchase records for each diesel fuel tank shall be maintained on site.
- Type of fuel burned and sulfur concentration by weight.

Authority for Requirement: LCPH ATI 3356 / PTO 3363

# **Compliance Monitoring:**

Each diesel generator shall have a separate fuel meter installed in order to record monthly fuel consumption.

Authority for Requirement: LCPH ATI 3356 / PTO 3363

#### **Reporting:**

• Submit quarterly reports of fuel usage to the Linn County Public Health Department Air Quality Division by the 30<sup>th</sup> day of January, April, July, and October.

Authority for Requirement: LCPH ATI 3356 / PTO 3363

## **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Periodic Monitoring is not required at this time.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒ Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

# **Emission Point ID Number: 136**

### Associated Equipment

Associated Emission Unit ID Numbers: 136

# **Applicable Requirements**

Emission Unit vented through this Emission Point: 136 Emission Unit Description: Diesel Emergency Generator

Raw Material/Fuel: Diesel Fuel Rated Capacity: 121.9 gal/hr

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit(s): 20%

Authority for Requirement: LCPH ATI 3357 / PTO 3364

LCO 10.7

Pollutant: PM-10

Emission Limit(s): 2.4 lb/hr, 0.18 tpy

Authority for Requirement: LCPH ATI 3357 / PTO 3364

Pollutant: Particulate Matter

Emission Limit(s): 2.4 lb/hr, 0.18 tpy

Authority for Requirement: LCPH ATI 3357 / PTO 3364

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 0.65 tpy

Authority for Requirement: LCPH ATI 3357 / PTO 3364

Pollutant: Nitrogen Oxide (NO<sub>x</sub>)

Emission Limit(s): 54.7 lb/hr, 4.10 tpy

Authority for Requirement: LCPH ATI 3357 / PTO 3364

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

## **Operation Limits:**

- Maximum fuel usage: 121.9 gallons/hr
- This source shall be limited to 18,285 gallons of diesel fuel per year calculated on a 12-month rolling average. Maximum fuel usage shall not exceed 121.9 gallons per hour.
- Fuel use in this unit shall be either #1 or #2 grade diesel fuel only, with a maximum sulfur content of 0.5% sulfur by weight.

Authority for Requirement: LCPH ATI 3357 / PTO 3364

### **Record keeping Requirements:**

A monthly log of operation shall be maintained for the operation of the above listed unit. As a minimum the following information shall be recorded and kept on site for a period of five years. These records shall be available at all times for viewing by air pollution control personnel.

- Total gallons of fuel combusted calculated monthly using a 12-month rolling average.
- Purchase records for each diesel fuel tank shall be maintained on site.
- Type of fuel burned and sulfur concentration by weight.

Authority for Requirement: LCPH ATI 3357 / PTO 3364

# **Compliance Monitoring:**

Each diesel generator shall have a separate fuel meter installed in order to record monthly fuel consumption.

Authority for Requirement: LCPH ATI 3357 / PTO 3364

#### **Reporting:**

 Submit quarterly reports of fuel usage to the Linn County Public Health Department Air Quality Division by the 30<sup>th</sup> day of January, April, July, and October.
 Authority for Requirement: LCPH ATI 3357 / PTO 3364

#### **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Periodic monitoring not required at this time.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌	No 🗵
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌	] No ⊠

# **Emission Point ID Number: 137**

### Associated Equipment

Associated Emission Unit ID Numbers: 137

# **Applicable Requirements**

Emission Unit vented through this Emission Point: 137 Emission Unit Description: Diesel Emergency Generator

Raw Material/Fuel: Diesel Fuel Rated Capacity: 138.2 gal/hr

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit(s): 20%

Authority for Requirement: LCPH ATI 3358 / PTO 3362

LCO 10.7

Pollutant: PM-10

Emission Limit(s): 2.7 lb/hr, 0.48 tpy

Authority for Requirement: LCPH ATI 3358 / PTO 3362

Pollutant: Particulate Matter

Emission Limit(s): 2.7 lb/hr, 0.48 tpy

Authority for Requirement: LCPH ATI 3358 / PTO 3362

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)

Emission Limit(s): 9.74 lb/hr, 1.71 tpy

Authority for Requirement: LCO 10.12(1)"c"

Pollutant: Nitrogen Oxide (NO<sub>x</sub>)

Emission Limit(s): 42.58 lb/hr, 7.50 tpy

Authority for Requirement: LCPH ATI 3358 / PTO 3362

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

### **Operation Limits:**

- Maximum fuel usage: 138.2 gallons per hour.
- This source shall be limited to 48, 646 gallons of diesel fuel per year calculated on a 12-month rolling average.
- Fuel use in this unit shall be either #1 or #2 grade diesel fuel only, with a maximum concentration of 0.5% sulfur by weight.

Authority for Requirement: LCPH ATI 3358 / PTO 3362

# **Record keeping Requirements:**

A log of operation shall be maintained for the operation of the above listed unit. As a minimum the following information shall be recorded and kept on site for a period of five years. These records shall be available at all times for viewing by air pollution control personnel.

- Total gallons of fuel consumed calculated monthly using a 12-month rolling average.
- Purchase records for each diesel fuel tank shall be maintained on site.
- Type of fuel burned and sulfur concentration by weight.

Authority for Requirement: LCPH ATI 3358 / PTO 3362

## **Compliance Testing and Monitoring:**

• Each diesel generator shall have a separate fuel meter installed in order to record monthly fuel consumption.

Authority for Requirement: LCPH ATI 3358 / PTO 3362

### **Reporting:**

• Submit quarterly reports of fuel usage to the Linn County Public Health Department Air Quality Division by the 30<sup>th</sup> day of January, April, July, and October.

Authority for Requirement: LCPH ATI 3358 / PTO 3362

#### **Compliance Plan**

The owner/operator of this equipment shall comply with the applicable requirements listed below.

With the exception(s) listed below, this point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

## Exception(s)

For this point to come into compliance, a stack test must be performed within six months of issuance of this permit on one of the following emission points: 137, 138 or 139.

# **Condition(s)**

The permittee shall perform a stack test for nitrogen oxides  $(NO_x)$  on emission point 137, 138 or 139 within six months of issuance of this permit to demonstrate compliance with the permit limit of 42.58 lb/hr, 7.50 tpy  $NO_x$ . Emission factors from AP-42 show a calculated potential exceedance of the permit limit. A stack test on emission point 137, 138 or 139 will represent the compliance testing for all three emission points. If the stack test does not show compliance, further evaluation will be required to bring the units into continuous compliance. This point will be in compliance at the time that the stack testing demonstrates the emission limit is met.

## **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

# **Stack Testing:**

 $\begin{array}{l} Pollutant-Nitrogen\ Oxides\ (NO_x)\\ 1^{st}\ Stack\ Test\ to\ be\ Completed\ by-April\ 3,\ 2003\\ Test\ Method-Method\ 7E\ (40\ CFR\ 60)\ or\ approved\ alternative\\ Authority\ for\ Requirement-567\ IAC\ 22.108(3) \end{array}$ 

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7).

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒
Facility Maintained Operation & Maintenance Plan Required? Yes 🗌 No 🗵
Authority for Requirement: 567 IAC 22.108(3)"b"

# **Emission Point ID Number: 138**

### Associated Equipment

Associated Emission Unit ID Numbers: 138

# **Applicable Requirements**

Emission Unit vented through this Emission Point: 138 Emission Unit Description: Diesel Emergency Generator

Raw Material/Fuel: Diesel Fuel Rated Capacity: 138.2 gal/hr

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit(s): 20%

Authority for Requirement: LCPH ATI 3359 / PTO 3361

LCO 10.7

Pollutant: PM-10

Emission Limit(s): 2.7 lb/hr, 0.48 tpy

Authority for Requirement: LCPH ATI 3359 / PTO 3361

Pollutant: Particulate Matter

Emission Limit(s): 2.7 lb/hr, 0.48 tpy

Authority for Requirement: LCPH ATI 3359 / PTO 3361

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)

Emission Limit(s): 9.74 lb/hr, 1.71 tpy

Authority for Requirement: LCPH ATI 3359 / PTO 3361

Pollutant: Nitrogen Oxide (NO<sub>x</sub>)

Emission Limit(s): 42.58 lb/hr, 7.50 tpy

Authority for Requirement: LCPH ATI 3359 / PTO 3361

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

# **Operation Limits:**

- Maximum fuel usage: 138.2 gallons/hr
- This source shall be limited to 48,646 gallons of diesel fuel per year calculated on a 12-month rolling average.
- Fuel use in this unit shall be either #1 or #2 grade diesel fuel only, with a maximum concentration of 0.5% sulfur by weight.

Authority for Requirement: LCPH ATI 3359 / PTO 3361

### **Record keeping Requirements:**

A log of operation shall be maintained for the operation of the above listed unit. As a minimum the following information shall be recorded and kept on site for a period of five years. These records shall be available at all times for viewing by air pollution control personnel.

- Total gallons of fuel consumed calculated monthly using a 12-month rolling average.
- Purchase records for each diesel fuel tank shall be maintained on site.
- Type of fuel burned and sulfur concentration by weight.

Authority for Requirement: LCPH ATI 3359 / PTO 3361

## **Compliance Testing and Monitoring:**

• Each diesel generator shall have a separate fuel meter installed in order to record monthly fuel consumption.

Authority for Requirement: LCPH ATI 3359 / PTO 3361

### • Reporting:

Submit quarterly reports of fuel usage to the Linn County Public Health Department Air Quality Division by the 30<sup>th</sup> day of January, April, July, and October.

Authority for Requirement: LCPH ATI 3359 / PTO 3361

#### **Compliance Plan**

The owner/operator of this equipment shall comply with the applicable requirements listed below.

With the exception(s) listed below, this point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

## Exception(s)

For this point to come into compliance, a stack test must be performed within six months of issuance of this permit on one of the following emission points: 137, 138 or 139.

# **Condition(s)**

The permittee shall perform a stack test for nitrogen oxides  $(NO_x)$  on emission point 137, 138 or 139 within six months of issuance of this permit to demonstrate compliance with the permit limit of 42.58 lb/hr, 7.50 tpy  $NO_x$ . Emission factors from AP-42 show a calculated potential exceedance of the permit limit. A stack test on emission point 137, 138 or 139 will represent the compliance testing for all three emission points. If the stack test does not show compliance, further evaluation will be required to bring the units into continuous compliance. This point will be in compliance at the time that the stack testing demonstrates the emission limit is met.

## **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

# **Stack Testing:**

 $\begin{array}{l} Pollutant-Nitrogen\ Oxides\ (NO_x)\\ 1^{st}\ Stack\ Test\ to\ be\ Completed\ by-April\ 3,\ 2003\\ Test\ Method-Method\ 7E\ (40\ CFR\ 60)\ or\ approved\ alternative\\ Authority\ for\ Requirement-567\ IAC\ 22.108(3) \end{array}$ 

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7).

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒
Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ⊠
Authority for Requirement: 567 IAC 22.108(3)"b"

# **Emission Point ID Number: 139**

### Associated Equipment

Associated Emission Unit ID Numbers: 139

# **Applicable Requirements**

Emission Unit vented through this Emission Point: 139 Emission Unit Description: Diesel Emergency Generator

Raw Material/Fuel: Diesel Fuel Rated Capacity: 138.2 gal/hr

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit(s): 20%

Authority for Requirement: LCPH ATI 3360 / PTO 3360

LCO 10.7

Pollutant: PM-10

Emission Limit(s): 2.7 lb/hr, 0.48 tpy

Authority for Requirement: LCPH ATI 3360 / PTO 3360

Pollutant: Particulate Matter

Emission Limit(s): 2.7 lb/hr, 0.48 tpy

Authority for Requirement: LCPH ATI 3360 / PTO 3360

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)

Emission Limit(s): 9.74 lb/hr, 1.71 tpy

Authority for Requirement: LCPH ATI 3360 / PTO 3360

Pollutant: Nitrogen Oxide (NO<sub>x</sub>)

Emission Limit(s): 42.58 lb/hr, 7.50 tpy

Authority for Requirement: LCPH ATI 3360 / PTO 3360

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

# **Operation Limits:**

- Maximum fuel usage: 138.2 gallons/hr
- This source shall be limited to 48,646 gallons of diesel fuel per year calculated on a 12-month rolling average.
- Fuel use in this unit shall be either #1 or #2 grade diesel fuel only, with a maximum concentration of 0.5% sulfur by weight.

Authority for Requirement: LCPH ATI 3360 / PTO 3360

# **Record keeping Requirements:**

A log of operation shall be maintained for the operation of the above listed unit. As a minimum the following information shall be recorded and kept on site for a period of five years. These records shall be available at all times for viewing by air pollution control personnel.

- Total gallons of fuel consumed calculated monthly using a 12-month rolling average.
- Purchase records for each diesel fuel tank shall be maintained on site.
- Type of fuel burned and sulfur concentration by weight.

Authority for Requirement: LCPH ATI 3360 / PTO 3360

# **Compliance Testing and Monitoring:**

• Each diesel generator shall have a separate fuel meter installed in order to record monthly fuel consumption.

Authority for Requirement: LCPH ATI 3360 / PTO 3360

### **Reporting:**

• Submit quarterly reports of fuel usage to the Linn County Public Health Department Air Quality Division by the 30<sup>th</sup> day of January, April, July, and October.

Authority for Requirement: LCPH ATI 3360 / PTO 3360

#### **Compliance Plan**

The owner/operator of this equipment shall comply with the applicable requirements listed below.

With the exception(s) listed below, this point is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which will become effective during the permit term, this source will comply with such requirements in a timely manner.

## Exception(s)

For this point to come into compliance, a stack test must be performed within six months of issuance of this permit on one of the following emission points: 137, 138 or 139.

# **Condition(s)**

The permittee shall perform a stack test for nitrogen oxides  $(NO_x)$  on emission point 137, 138 or 139 within six months of issuance of this permit to demonstrate compliance with the permit limit of 42.58 lb/hr, 7.50 tpy  $NO_x$ . Emission factors from AP-42 show a calculated potential exceedance of the permit limit. A stack test on emission point 137, 138 or 139 will represent the compliance testing for all three emission points. If the stack test does not show compliance, further evaluation will be required to bring the units into continuous compliance. This point will be in compliance at the time that the stack testing demonstrates the emission limit is met.

## **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

# **Stack Testing:**

Pollutant – Nitrogen Oxides ( $NO_x$ )  $1^{st}$  Stack Test to be Completed by – April 3, 2003 Test Method – Method 7E (40 CFR 60) or approved alternative Authority for Requirement – 567 IAC 22.108(3)

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7).

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒
Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒
Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 140

# Associated Equipment

Associated Emission Unit ID Numbers: 140 Emissions Control Equipment ID Number: 140

Emissions Control Equipment Description: Packed Bed Scrubber

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# **Applicable Requirements**

Emission Unit vented through this Emission Point: 140

Emission Unit Description: Continuous Annealing and Pickling Line #1

Raw Material/Fuel: Sulfuric Acid

Rated Capacity: 9.9 ton/hr

Emission Unit vented through this Emission Point: 140

Emission Unit Description: Continuous Annealing and Pickling Line #1 – Oven Dryer

Raw Material/Fuel: Natural Gas Rated Capacity: 6.63 MMBtu/hr

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit(s): 10%

Authority for Requirement: LCPH ATI 4015 / PTO 4070

Pollutant: PM-10

Emission Limit(s): 2.25 tpy

Authority for Requirement: LCPH ATI 4015 / PTO 4070

Pollutant: Particulate Matter Emission Limit(s): 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"(2)

LCO 10.9(1)"a"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 2.25 tpy

Authority for Requirement: LCPH ATI 4015 / PTO 4070

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### **Control Device:**

A packed bed water scrubber shall be installed, maintained and operated anytime the pickling and annealing line is operating. A pressure drop gauge shall be installed across the scrubber. A gauge to measure water flow rates to the scrubber and the water flow re-circulation shall be installed.

Authority for Requirement: LCPH ATI 4015 / PTO 4070

### **Operating Limits:**

Exhaust Airflow Rate: 3000 dscfm ± 10%

Airflow to the scrubber shall not exceed 3000 dscfm  $\pm$  10%. If this airflow is exceeded then a new authorization to install/modify permit is necessary. Minimum water flow rates shall be determined at the time of final compliance inspections and shall become part of the permit to operate.

Authority for Requirement: LCPH ATI 4015 / PTO 4070

# **Monitoring Requirements:**

Daily monitoring of scrubber pressure drops, freshwater makeup, and water re-circulation rate.

Authority for Requirement: LCPH ATI 4015 / PTO 4070

# **Record keeping Requirements:**

A log of operation shall be maintained for the operation of the scrubber. As a minimum, the following information shall be recorded and kept on site for a period of no less than five years for viewing by air pollution control personnel.

- Daily pressure drop readings across the scrubber
- Daily water re-circulation flow rate
- Daily freshwater makeup rate

Authority for Requirement: LCPH ATI 4015 / PTO 4070

#### **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Stack testing not required at this time.

#### **Opacity Monitoring:**

The facility shall check the opacity weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Opacity shall be observed to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required.

If an opacity >10 % is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Authority for Requirement: 567 IAC 22.108(13)

**Agency Approved Operation & Maintenance Plan Required?** Yes □ No ⊠

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Emission Point ID Number: 141

## Associated Equipment

Associated Emission Unit ID Numbers: 141 Emissions Control Equipment ID Number: 141 Emissions Control Equipment Description: Scrubber

# **Applicable Requirements**

Emission Unit vented through this Emission Point: 141

Emission Unit Description: Continuous Annealing and Pickling Line #2

Raw Material/Fuel: Sulfuric Acid

Rated Capacity: 9.9 ton/hr

Emission Unit vented through this Emission Point: 141

Emission Unit Description: Continuous Annealing and Pickling Line #2 – Oven Dryer

Raw Material/Fuel: Natural Gas Rated Capacity: 6.63 MMBtu/hr

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit(s): 10%

Authority for Requirement: LCPH ATI 3504 / PTO 3974

Pollutant: PM-10

Emission Limit(s): 2.25 tpy

Authority for Requirement: LCPH ATI 3504 / PTO 3974

Pollutant: Particulate Matter Emission Limit(s): 2.25 tpy

Authority for Requirement: LCPH ATI 3504 / PTO 3974

Pollutant: H<sub>2</sub>SO<sub>4</sub>

Emission Limit(s): 2.25 tpy

Authority for Requirement: LCPH ATI 3504 / PTO 3974

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### **Control Device:**

A packed bed water scrubber shall be installed, maintained and operated anytime the pickling and annealing line is operating. A pressure drop gauge shall be installed across the scrubber. A gauge to measure water flow rates to the scrubber and the water flow re-circulation shall be installed.

Authority for Requirement: LCPH ATI 3504 / PTO 3974

### **Operating Limits:**

Airflow to the scrubber shall not exceed  $3000 \pm 10\%$  dscfm. If this airflow is exceeded, then a new authorization to install/modify permit is necessary. Minimum water flow rates shall be determined at the time of final compliance inspections and shall become a part of the permit to operate.

Authority for Requirement: LCPH ATI 3504 / PTO 3974

#### **Monitoring Requirements:**

Daily monitoring of scrubber pressure drops, freshwater makeup, and water re-circulation rate.

Authority for Requirement: LCPH ATI 3504 / PTO 3974

### **Record keeping Requirements:**

A log of operation shall be maintained for the operation of the scrubber. As a minimum, the following information shall be recorded and kept on site for a period of five years. These records shall be available at all times for viewing by air pollution control personnel.

- Daily pressure drop readings
- Daily water re-circulation flow rate
- Daily freshwater makeup rate

Records shall be kept for no less than five years.

Authority for Requirement: LCPH ATI 3504 / PTO 3974

#### **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Stack testing not required at this time.

#### **Opacity Monitoring:**

The facility shall check the opacity weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Opacity shall be observed to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required.

If an opacity >10 % is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Authority for Requirement: 567 IAC 22.108(13)

Agency Approved Operation & Maintenance Plan Required? Yes  $\square$  No  $\boxtimes$ 

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

# **Emission Point ID Number: 144**

### Associated Equipment

Associated Emission Unit ID Numbers: 144 Emissions Control Equipment ID Number: 144 Emissions Control Equipment Description: Filters

# **Applicable Requirements**

Emission Unit vented through this Emission Point: 144

Emission Unit Description: 10 Ebner Annealing Furnace Bases with 6 Heating Bells

Raw Material/Fuel: Rolling Oil

Rated Capacity: 17.2 tons annealed/hr

Emission Unit vented through this Emission Point: 144

Emission Unit Description: 10 Ebner Annealing Furnace Bases with 6 Heating Bells

Raw Material/Fuel: Natural Gas Rated Capacity: 77.8 MMBtu/hr

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit(s): 5%

Authority for Requirement: LCPH ATI 4017 / PTO 4071

Pollutant: PM-10

Emission Limit(s): 0.1 gr/dscf, 0.66 tpy

Authority for Requirement: LCPH ATI 4017 / PTO 4071

Pollutant: Particulate Matter

Emission Limit(s): 0.1 gr/dscf, 0.66 tpy

Authority for Requirement: LCPH ATI 4017 / PTO 4071

567 IAC 23.3(2)"a"(2)

LCO 10.9(1)"a"

# **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### **Control Device:**

Filter elements will be installed to control particulate emissions and to reduce opacity. The filter elements shall be maintained in place and in good operating condition at all times. Filters shall be changed on a regular basis as needed.

Authority for Requirement: LCPH ATI 4017 / PTO 4071

#### **Operating Limits:**

Maintain filter elements in proper operating condition per manufacturer's specifications. Authority for Requirement: LCPH ATI 4017 / PTO 4071

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Stack testing is not required at this time.

**Periodic Monitoring Requirements** 

# **Opacity Monitoring:**

The facility shall check the opacity weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Opacity shall be observed to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required.

If an opacity >5 % is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Authority for Requirement: 567 IAC 22.108(13)

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒
Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ⊠
Authority for Requirement: 567 IAC 22.108(3)"b"

# **Emission Point ID Number: 145**

# Associated Equipment

Associated Emission Unit ID Numbers: 145 Emissions Control Equipment ID Number: 145

Emissions Control Equipment Description: Mist Collector: Cartridge Filter

# **Applicable Requirements**

Emission Unit vented through this Emission Point: 145 Emission Unit Description: Four Stand Tandem Mill

Raw Material/Fuel: Copper and Brass Alloys

Rated Capacity: 18.47 ton/hr

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit(s): 10%

Authority for Requirement: LCPH ATI 3765 / PTO 4076

Pollutant: PM-10

Emission Limit(s): 0.24 lb/hr, 1.05 tpy

Authority for Requirement: LCPH ATI 3765 / PTO 4076

Pollutant: Particulate Matter Emission Limit(s): 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"(2)

LCO 10.9(1)"a"

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### **Operation Limits:**

- Exhaust Airflow Rate:  $51,000 \text{ dscfm} \pm 10\%$
- Airflow to the furnace shall not exceed 51,000 dscfm  $\pm$  10%. If this airflow is exceeded a new authorization to install/modify permit is necessary.

Authority for Requirement: LCPH ATI 3765 / PTO 4076

#### **Compliance Testing and Monitoring Requirements:**

The above mentioned source demonstrated compliance through source testing in accordance with the Linn County Ordinance, Chapter 10, Sections 17, 18 and 19. On November 16, 2000, Interpoll Laboratories, Inc. successfully completed the source test in accordance with EPA Methods 1-5, CFR Title 40, Part 60 Appendix A (revised July 1, 2000), and EPA Method 202 (CFR Title 40, Part 51, Appendix M).

Authority for Requirement: LCPH ATI 3765 / PTO 4076

# **Record keeping Requirements:**

A log of operation shall be maintained for the operation of the above listed unit. As a minimum the following information shall be recorded and kept on site for a period of no less than five years. These records shall be available at all times for viewing by air pollution control personnel.

• All maintenance performed on the emission unit and control device.

Authority for Requirement: LCPH ATI 3765 / PTO 4076

# **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Stack testing not required at this time.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

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# **Emission Point ID Number: 146**

#### Associated Equipment

Associated Emission Unit ID Numbers: 146 Emissions Control Equipment ID Number: 146 Emissions Control Equipment Description: Scrubber

# **Applicable Requirements**

Emission Unit vented through this Emission Point: 146 Emission Unit Description: Degreasing Pickle Line

Raw Material/Fuel: Sulfuric Acid

Rated Capacity: 5.9 lb/hr

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit(s): 10%

Authority for Requirement: LCPH ATI 3829 / PTO 4072

Pollutant: PM-10

Emission Limit(s): 0.65 lb/hr, 2.85 tpy

Authority for Requirement: LCPH ATI 3829 / PTO 4072

Pollutant: Particulate Matter

Emission Limit(s): 0.65 lb/hr, 2.85 tpy

Authority for Requirement: LCPH ATI 3829 / PTO 4072

Pollutant: Sulfur Dioxide (SO<sub>2</sub>)

Emission Limit(s): 0.65 lb/hr, 2.85 tpy

Authority for Requirement: LCPH ATI 3829 / PTO 4072

# **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### **Control Device:**

A fume scrubber shall be installed, maintained, and operated anytime the pickling and annealing line is operating. A pressure drop gauge shall be installed across the scrubber. A gauge to measure the freshwater flow rate to the scrubber and the water flow re-circulation rate shall be installed.

Authority for Requirement: LCPH ATI 3829 / PTO 4072

#### **Operation Limits:**

Exhaust Airflow Rate: 3766 dscfm ± 10%

Airflow to the scrubber shall not exceed 3766 dscfm  $\pm$  10%. If this airflow is exceeded then a new authorization to install/modify permit is necessary. A minimum water re-circulation rate of 50 GPM shall be maintained when the degreesing pickle line is operating.

Authority for Requirement: LCPH ATI 3829 / PTO 4072

# **Monitoring Requirements:**

Daily monitoring of the fume scrubber pressure drop, freshwater makeup, and water recirculation rate is required.

Authority for Requirement: LCPH ATI 3829 / PTO 4072

# **Record keeping Requirements:**

A log of operation shall be maintained for the operation of the scrubber. As a minimum, the following information shall be recorded and kept on site for a period of five years. These records shall be available at all times for viewing by air pollution control personnel.

- Daily pressure drop readings
- Daily water re-circulation flow rate
- Daily freshwater makeup rate

Authority for Requirement: LCPH ATI 3829 / PTO 4072

# **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Stack testing not required at this time.

# **Opacity Monitoring:**

The facility shall check the opacity weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Opacity shall be observed to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required.

If an opacity >10 % is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Authority for Requirement: 567 IAC 22.108(13)

<b>Agency Approved Operation &amp; Maintenance Plan Required?</b> Yes ☐ No ☒
Facility Maintained Operation & Maintenance Plan Required? Yes . No
Authority for Requirement: 567 IAC 22.108(3)"b"

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# **Emission Point ID Number: 147**

Associated Equipment

Associated Emission Unit ID Numbers: 147

# **Applicable Requirements**

Emission Unit vented through this Emission Point: 147

Emission Unit Description: Roller Hearth

Raw Material/Fuel: Coolant Oils Rated Capacity: 36,770 gallons/yr

Emission Unit vented through this Emission Point: 147

Emission Unit Description: Roller Hearth

Raw Material/Fuel: Natural Gas Rated Capacity: 5.49 MMBtu/hr

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit(s): 10%

Authority for Requirement: LCPH ATI 3983 / PTO 4075

Pollutant: PM-10

Emission Limit(s): 0.076 lb/hr, 0.33 tpy

Authority for Requirement: LCPH ATI 3983 / PTO 4075

Pollutant: Particulate Matter Emission Limit(s): 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a"(2)

LCO 10.9(1)"a"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 0.01 tpy

Authority for Requirement: LCPH ATI 3983 / PTO 4075

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppmv

Authority for Requirement: 567 IAC 23.3(3)"e"

LCO 10.12(2)

Pollutant: Nitrogen Oxide (NO<sub>x</sub>) Emission Limit(s): 2.40 tpy

Authority for Requirement: LCPH ATI 3983 / PTO 4075

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 0.13 tpy

Authority for Requirement: LCPH ATI 3983 / PTO 4075

Pollutant: Carbon Monoxide (CO)

Emission Limit(s): 0.48 tpy

Authority for Requirement: LCPH ATI 3983 / PTO 4075

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

# **Operation Limits:**

• Exhaust Airflow Rate: 6000 scfm ± 10%

• Natural Gas Consumption: 5.49 MMBtu/hr

Airflow to the furnace shall not exceed 6000 scfm  $\pm$  10%. If this airflow is exceeded a new authorization to install/modify permit is necessary.

• Fuel use in the furnace shall be limited to natural gas only.

Authority for Requirement: LCPH ATI 3983 / PTO 4075

#### **Compliance Testing and Monitoring Requirements:**

The above mentioned source demonstrated compliance through source testing in accordance with the Linn County Ordinance, Chapter 10, Sections 17, 18 and 19. On November 15, 2000, Interpoll Laboratories, Inc. successfully completed the source test in accordance with EPA Methods 1-5, CFR Title 40, Part 60 Appendix A (revised July 1, 2000), and EP Method 202 (CFR Title 40, Part 51, Appendix M).

Authority for Requirement: LCPH ATI 3983 / PTO 4075

# **Record keeping Requirements:**

A log of operation shall be maintained for the operation of the above listed unit. As a minimum the following information shall be recorded and kept on site for a period of no less than three years. These records shall be available at all times for viewing by air pollution control personnel.

- Natural gas consumption based on a 12-month rolling average
- All maintenance performed on the emission unit and control device

Authority for Requirement: LCPH ATI 3983 / PTO 4075

#### **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Stack testing not required at this time.

#### **Opacity Monitoring:**

The facility shall check the opacity monthly during a period when the emission unit on this emission point is at or near full capacity and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Opacity shall be observed to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required.

If an opacity >10 % is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Authority for Requirement: 567 IAC 22.108(13)

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

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# **Emission Point ID Number: 148**

#### Associated Equipment

Associated Emission Unit ID Numbers: 148 Emissions Control Equipment ID Number: 148 Emissions Control Equipment Description: Filters

# **Applicable Requirements**

Emission Unit vented through this Emission Point: 148

Emission Unit Description: 10 Ebner Annealing Furnace Bases with 6 Heating Bells

Material/Fuel: Rolling Oil

Rated Capacity: 17.2 tons annealed/hr

Emission Unit vented through this Emission Point: 148

Emission Unit Description: 10 Ebner Annealing Furnace Bases with 6 Heating Bells

Raw Material/Fuel: Natural Gas Rated Capacity: 77.8 MMBtu/hr

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit(s): 5%

Authority for Requirement: LCPH ATI 4016 / PTO 4073

Pollutant: PM-10

Emission Limit(s): 0.1 gr/dscf, 0.66 tpy

Authority for Requirement: LCPH ATI 4016 / PTO 4073

Pollutant: Particulate Matter

Emission Limit(s): 0.1 gr/dscf, 0.66 tpy

Authority for Requirement: LCPH ATI 4016 / PTO 4073

567 IAC 23.3(2)"a"(2)

LCO 10.9(1)"a"

# **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### **Control Device:**

Filter elements will be installed to control particulate emissions and to reduce opacity. The filter elements shall be maintained in place and in good operating condition at all times. Filters shall be changed on a regular basis as needed.

Authority for Requirement: LCPH ATI 4016 / PTO 4073

# **Operating Limits:**

Maintain filter elements in proper operating condition per manufacturers specifications.

Authority for Requirement: LCPH ATI 4016 / PTO 4073

# **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Stack testing is not required at this time.

# **Opacity Monitoring:**

The facility shall check the opacity weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. Maintain a written record of the observation and any action resulting from the observation for a minimum of five years. Opacity shall be observed to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required.

If an opacity >5 % is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Authority for Requirement: 567 IAC 22.108(13)

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒
Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ⊠
Authority for Requirement: 567 IAC 22.108(3)"b"

# **Emission Point ID Number: 149**

#### Associated Equipment

Associated Emission Unit ID Numbers: 149 Emissions Control Equipment ID Number: 149

Emissions Control Equipment Description: Baghouse

# **Applicable Requirements**

Emission Unit vented through this Emission Point: 149 Emission Unit Description: Bonding Mill – Dry Brushing

Material/Fuel: Copper and Brass Alloys

Rated Capacity: 23 ton/hr

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit(s): 20%

Authority for Requirement: LCPH ATI 4256 / PTO 0

Pollutant: PM-10

Emission Limit(s): 0.015 gr/dscf, 3.09 lb/hr, 13.52 tpy Authority for Requirement: LCPH ATI 4256 / PTO 0

Pollutant: Particulate Matter

Emission Limit(s): 0.015 gr/dscf, 3.09 lb/hr, 13.52 tpy Authority for Requirement: LCPH ATI 4256 / PTO 0

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### **Control Device:**

A baghouse dust collector shall be maintained in proper operating condition and shall be in use at all times. A pressure drop gauge shall be installed and operating in order to determine the differential pressure across the dust collector. This gauge should be easily accessible to PMX and air pollution control personnel.

Authority for Requirement: LCPH ATI 4256 / PTO 0

# **Operating Limits:**

The maximum operating capacity of this device is:

Rated Capacity: 8.41 ton/hr

Exhaust Airflow Rate:  $24,000 \text{ scfm} \pm 10\%$ 

Airflow to the dust collector shall be limited to  $24,000 \text{ scfm} \pm 10\%$ . Any increase in the exhaust air flow rate would be considered a modification and would require a new Authorization to Install/Modify permit.

Authority for Requirement: LCPH ATI 4256 / PTO 0

#### **Compliance Monitoring:**

The following information shall be monitored:

- Weekly pressure drop readings when in use
- Monthly production rate

All monitors shall be easily accessible to air pollution personnel.

Authority for Requirement: LCPH ATI 4256 / PTO 0

# **Record keeping Requirements:**

A log of operation shall be maintained for the above listed unit. The following information shall be recorded and kept on site for a period of no less than five years.

- Weekly pressure drop readings when in use
- Monthly production rate
- Any changes in operation that would affect emissions, including increases in air flow speed
- Records of all maintenance performed on the dust collector

These records shall be available on site at all times for viewing by air pollution control personnel.

Authority for Requirement: LCPH ATI 4256 / PTO 0

#### **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

#### **Stack Testing:**

Pollutant – Particulate Matter 1st Stack Test to be Completed by – October 3, 2004 Test Method – Iowa Compliance Sampling Manual Authority for Requirement – 567 IAC 22.108(3)

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

#### **Opacity Monitoring:**

The facility shall check the opacity weekly during a period when the emission unit on this emission point is at or near full capacity and record the reading. Maintain a written record of the

observation and any action resulting from the observation for a minimum of five years. Opacity shall be observed to ensure that no visible emissions occur during the material handling operation of the unit. If visible emissions are observed corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If corrective action does not return the observation to no visible emissions, then a Method 9 observation will be required.

If an opacity >20 % is observed, this would be a violation and corrective action will be taken as soon as possible, but no later than eight hours from the observation of visible emissions. If weather conditions prevent the observer from conducting an opacity observation, the observer shall note such conditions on the data observation sheet. At least three attempts shall be made to retake opacity readings at approximately 2-hour intervals throughout the day. If all observation attempts for a week have been unsuccessful due to weather, an observation shall be made the next operating day where weather permits.

Authority for Requirement: 567 IAC 22.108(13)

# Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

# Facility Maintained Operation & Maintenance Plan Required? Yes 🛛 No 🗌

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six (6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least five (5) years. The plan and associated record keeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

# **Emission Point ID Number: 151**

# Associated Equipment

Associated Emission Unit ID Numbers: 151 Emissions Control Equipment ID Number: 151

Emissions Control Equipment Description: Centrifugal Collector, Fabric Filter

# **Applicable Requirements**

Emission Unit vented through this Emission Point: 151

Emission Unit Description: Cast Shop Central Vacuum System Material/Fuel: Dusts Associated with Casting Operations

Rated Capacity: 900 cfm

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity Emission Limit(s): 20%

Authority for Requirement: LCPH ATI 4254 / PTO 0

Pollutant: PM-10

Emission Limit(s): 0.01 gr/dscf, 0.08 lb/hr, 0.34 tpy Authority for Requirement: LCPH ATI 4254 / PTO 0

Pollutant: Particulate Matter

Emission Limit(s): 0.01 gr/dscf, 0.08 lb/hr, 0.34 tpy Authority for Requirement: LCPH ATI 4254 / PTO 0

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### **Control Device:**

A baghouse dust collector shall be maintained in proper operating condition and shall be in use at all times. A cyclone is also being installed prior to the baghouse due to the uncertainty of the dust loading capacity. This cyclone shall be maintained in proper operating condition and shall be in use at all times. A pressure drop gauge shall be installed and operating in order to determine the differential pressure across the dust collector. This gauge should be easily accessible to PMX and air pollution control personnel.

Authority for Requirement: LCPH ATI 4254 / PTO 0

#### **Operating Limits:**

The maximum operating capacity of this device is:

Exhaust Airflow Rate: 900 scfm ± 10%

• Airflow to the dust collector shall be limited to 900 scfm ± 10%. Any increase in the exhaust air flow rate would be considered a modification and would require a new Authorization to Install/Modify permit.

Authority for Requirement: LCPH ATI 4254 / PTO 0

# **Compliance Monitoring:**

The following information shall be monitored:

• Weekly pressure drop readings when in use

All monitors shall be easily accessible to air pollution personnel.

Authority for Requirement: LCPH ATI 4254 / PTO 0

#### **Record keeping Requirements:**

A log of operation shall be maintained for the above listed unit. The following information shall be recorded and kept on site for a period of no less than five years.

- Weekly pressure drop readings when in use
- Any changes in operation that would affect emissions, including increases in air flow speed
- Records of all maintenance performed on the dust collector

These records shall be available on site at all times for viewing by air pollution control personnel.

Authority for Requirement: LCPH ATI 4254 / PTO 0

#### **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Stack testing not required at this time.

Agency Approved Operation & Maintena	ance Plan Required?	Yes ☐ No ⊠
<b>Facility Maintained Operation &amp; Mainten</b>	nance Plan Required?	Yes⊠ No □

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated record keeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 1		
Associated Equipment		
Associated Emission Unit ID Numbers: 1		
Applicable Requirements		
Emission Unit vented through this Emission Point: 1 Emission Unit Description: Cast Shop Fugitive Raw Material/Fuel: Copper and Brass Alloys Rated Capacity: 25.26 tons Ore/hr		
Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.) The emissions from this emission point shall not exceed the levels specified below.		
Pollutant: Fugitive Dust  No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired, or demolished, without taking reasonable precautions to prevent particulate matter in quantities sufficient to create a nuisance. All persons, with the above exceptions, shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.  Authority for Requirement: 567 IAC 23.3(2)"c"  LCO 10.13		
Periodic Monitoring Requirements  The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.		
No periodic monitoring is required at this time.		
Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒		
Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒		
Authority for Requirement: 567 IAC 22.108(3)"b"		

# IV. General Conditions

This permit is issued under the authority of the Iowa Code subsection 455B.133(8) and in accordance with 567 Iowa Administrative Code chapter 22.

# **G1.** Duty to Comply

- 1. The permittee must comply with all conditions of the Title V permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. 567 IAC 22.108(9)"a"
- 2. Any compliance schedule shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. 567 IAC 22.105 (2)"h"(3)
- 3. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be enforceable by the administrator and are incorporated into this permit. 567 IAC 22.108 (1)"b"
- 4. Unless specified as either "state enforceable only" or "local program enforceable only", all terms and conditions in the permit, including provisions to limit a source's potential to emit, are enforceable by the administrator and citizens under the Act. 567 IAC 22.108 (14)
- 5. It shall not be a defense for a permittee, in an enforcement action, that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. 567 IAC 22.108 (9)"b"

# **G2. Permit Expiration**

- 1. Except as provided in 567 IAC 22.104, the expiration of this permit terminates the permittee's right to operate unless a timely and complete application has been submitted for renewal. Any testing required for renewal shall be completed before the application is submitted. 567 IAC 22.116(2)
- 2. To be considered timely, the owner, operator, or designated representative (where applicable) of each source required to obtain a Title V permit shall present or mail the Air Quality Bureau, Iowa Department of Natural Resources, Air Quality Bureau, 7900 Hickman Rd, Suite #1, Urbandale, Iowa 50322, four or more copies of a complete permit application, at least 6 months but not more than 18 months prior to the date of permit expiration. The definition of a complete application is as indicated in 567 IAC 22.105(2). 567 IAC 22.105

# **G3.** Certification Requirement for Title V Related Documents

Any application, report, compliance certification or other document submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. 567 IAC 22.107 (4)

#### **G4.** Annual Compliance Certification

By March 31 of each year, the permittee shall submit compliance certifications for the previous calendar year. The certifications shall include descriptions of means to monitor the compliance status of all emissions sources including emissions limitations, standards, and work practices in accordance with applicable requirements. The certification for a source shall include the identification of each term or condition of the permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with all applicable department rules. For sources determined not to be in compliance at the time of compliance certification, a compliance schedule shall be submitted which provides

for periodic progress reports, dates for achieving activities, milestones, and an explanation of why any dates were missed and preventive or corrective measures. The compliance certification shall be submitted to the administrator, director, and the appropriate DNR Field office. 567 IAC 22.108 (15)"e"

# **G5. Semi-Annual Monitoring Report**

By March 31 and September 30 of each year, the permittee shall submit a report of any monitoring required under this permit for the 6 month periods of July 1 to December 31 and January 1 to June 30, respectively. All instances of deviations from permit requirements must be clearly identified in these reports, and the report must be signed by a responsible official, consistent with 567 IAC 22.107(4). The semi-annual monitoring report shall be submitted to the director and the appropriate DNR Field office. 567 IAC 22.108 (5)

#### **G6.** Annual Fee

- 1. The permittee is required under subrule 567 IAC 22.106 to pay an annual fee based on the total tons of actual emissions of each regulated air pollutant. Beginning July 1, 1996, Title V operating permit fees will be paid on July 1 of each year. The fee shall be based on emissions for the previous calendar year.
- 2. The fee amount shall be calculated based on the first 4,000 tons of each regulated air pollutant emitted each year. The fee to be charged per ton of pollutant will be available from the department by June 1 of each year. The Responsible Official will be advised of any change in the annual fee per ton of pollutant.
- 3. The following forms shall be submitted annually by March 31 documenting actual emissions for the previous calendar year.
  - a. Form 1.0 "Facility Identification";
  - b. Form 4.0 "Emissions unit-actual operations and emissions" for each emission unit;
  - c. Form 5.0 "Title V annual emissions summary/fee"; and
  - d. Part 3 "Application certification."
- 4. The fee shall be submitted annually by July 1. The fee shall be submitted with the following forms:
  - a. Form 1.0 "Facility Identification";
  - b. Form 5.0 "Title V annual emissions summary/fee";
  - c. Part 3 "Application certification."
- 5. If there are any changes to the emission calculation form, the department shall make revised forms available to the public by January 1. If revised forms are not available by January 1, forms from the previous year may be used and the year of emissions documented changed. The department shall calculate the total statewide Title V emissions for the prior calendar year and make this information available to the public no later than April 30 of each year.
- 6. Phase I acid rain affected units under section 404 of the Act shall not be required to pay a fee for emissions which occur during the years 1993 through 1999 inclusive.
- 7. The fee for a portable emissions unit or stationary source which operates both in Iowa and out of state shall be calculated only for emissions from the source while operating in Iowa.
- 8. Failure to pay the appropriate Title V fee represents cause for revocation of the Title V permit as indicated in 567 IAC 22.115(1)"d".

#### **G7.** Inspection of Premises, Records, Equipment, Methods and Discharges

Upon presentation of proper credentials and any other documents as may be required by law, the permittee shall allow the director or the director's authorized representative to:

1. Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

- 2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- 3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- 4. Sample or monitor, at reasonable times, substances or parameters for the purpose of ensuring compliance with the permit or other applicable requirements. 567 IAC 22.108 (15)"b"

# **G8.** Duty to Provide Information

The permittee shall furnish to the director, within a reasonable time, any information that the director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the director copies of records required to be kept by the permit, or for information claimed to be confidential, the permittee shall furnish such records directly to the administrator of EPA along with a claim of confidentiality. 567 IAC 22.108 (9)"e"

# **G9.** General Maintenance and Repair Duties

The owner or operator of any air emission source or control equipment shall:

- 1. Maintain and operate the equipment or control equipment at all times in a manner consistent with good practice for minimizing emissions.
- 2. Remedy any cause of excess emissions in an expeditious manner.
- 3. Minimize the amount and duration of any excess emission to the maximum extent possible during periods of such emissions. These measures may include but not be limited to the use of clean fuels, production cutbacks, or the use of alternate process units or, in the case of utilities, purchase of electrical power until repairs are completed.
- 4. Schedule, at a minimum, routine maintenance of equipment or control equipment during periods of process shutdowns to the maximum extent possible. 567 IAC 24.2(1)

# **G10.** Recordkeeping Requirements for Compliance Monitoring

- 1. In addition to any source specific recordkeeping requirements contained in this permit, the permittee shall maintain the following compliance monitoring records, where applicable:
  - a. The date, place and time of sampling or measurements
  - b. The date the analyses were performed.
  - c. The company or entity that performed the analyses.
  - d. The analytical techniques or methods used.
  - e. The results of such analyses; and
  - f. The operating conditions as existing at the time of sampling or measurement.
  - g. The records of quality assurance for continuous compliance monitoring systems (including but not limited to quality control activities, audits and calibration drifts.)
- 2. The permittee shall retain records of all required compliance monitoring data and support information for a period of at least 5 years from the date of compliance monitoring sample, measurement report or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous compliance monitoring, and copies of all reports required by the permit.
- 3. For any source which in its application identified reasonably anticipated alternative operating scenarios, the permittee shall:
  - a. Comply with all terms and conditions of this permit specific to each alternative scenario.
  - b. Maintain a log at the permitted facility of the scenario under which it is operating.
  - c. Consider the permit shield, if provided in this permit, to extend to all terms and conditions under each operating scenario. 567 IAC 22.108(4), 567 IAC 22.108(12)

# G11. Evidence used in establishing that a violation has or is occurring.

Notwithstanding any other provisions of these rules, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions herein.

1. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at a source:

- a. A monitoring method approved for the source and incorporated in an operating permit pursuant to 567 Chapter 22;
- b. Compliance test methods specified in 567 Chapter 25; or
- c. Testing or monitoring methods approved for the source in a construction permit issued pursuant to 567 Chapter 22.
- 2. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
  - a. Any monitoring or testing methods provided in these rules; or
  - b. Other testing, monitoring, or information gathering methods that produce information comparable to that produced by any method in subrule 21.5(1) or this subrule. 567 IAC 21.5(1)-567 IAC 21.5(2)

# G12. Prevention of Accidental Release: Risk Management Plan Notification and Compliance Certification

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Act, the permittee shall notify the department of this requirement. The plan shall be filed with all appropriate authorities by the deadline specified by EPA. A certification that this risk management plan is being properly implemented shall be included in the annual compliance certification of this permit. 567 IAC 22.108(6)

#### G13. Hazardous Release

The permittee must report any situation involving the actual, imminent, or probable release of a hazardous substance into the atmosphere which, because of the quantity, strength and toxicity of the substance, creates an immediate or potential danger to the public health, safety or to the environment. A verbal report shall be made to the department at (515) 281-8694 and to the local police department or the office of the sheriff of the affected county as soon as possible but not later than six hours after the discovery or onset of the condition. This verbal report must be followed up with a written report as indicated in 567 IAC 131.2(2). 567 IAC Chapter 131-State Only

#### G14. Excess Emissions and Excess Emissions Reporting Requirements

1. Excess Emissions. Excess emission during a period of startup, shutdown, or cleaning of control equipment is not a violation of the emission standard if the startup, shutdown or cleaning is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions. Cleaning of control equipment which does not require the shutdown of the process equipment shall be limited to one six-minute period per one-hour period. An incident of excess emission (other than an incident during startup, shutdown or cleaning of control equipment) is a violation. If the owner or operator of a source maintains that the incident of excess emission was due to a malfunction, the owner or operator must show that the conditions which caused the incident of excess emission were not preventable by reasonable maintenance and control measures. Determination of any subsequent enforcement action will be made following review of this report. If excess emissions are occurring, either the control equipment causing the excess emission shall be repaired in an expeditious manner or the process generating the emissions shall be shutdown within a reasonable period of time. An expeditious manner is the time necessary to determine the cause of the excess emissions and to correct it within a reasonable period of time.

A reasonable period of time is eight hours plus the period of time required to shut down the process without damaging the process equipment or control equipment. In the case of an electric utility, a reasonable period of time is eight hours plus the period of time until comparable generating capacity is available to meet consumer demand with the affected unit out of service, unless, the director shall, upon investigation, reasonably determine that continued operation constitutes an unjustifiable environmental hazard and issue an order that such operation is not in the public interest and require a process shutdown to commence immediately.

- 2. Excess Emissions Reporting
  - a. Oral Reporting of Excess Emissions. An incident of excess emission (other than an incident of excess emission during a period of startup, shutdown, or cleaning) shall be reported to the appropriate field office of the department within eight hours of, or at the start of the first working day following the onset of the incident. The reporting exemption for an incident of excess emission during startup, shutdown or cleaning does not relieve the owner or operator of a source with continuous monitoring equipment of the obligation of submitting reports required in 567-subrule 25.1(6). An oral report of excess emission is not required for a source with operational continuous monitoring equipment (as specified in 567-subrule 25.1(1)) if the incident of excess emission continues for less than 30 minutes and does not exceed the applicable visible emission standard by more than 10 percent opacity. The oral report may be made in person or by telephone and shall include as a minimum the following:
    - i. The identity of the equipment or source operation from which the excess emission originated and the associated stack or emission point.
    - ii. The estimated quantity of the excess emission.
    - iii. The time and expected duration of the excess emission.
    - iv. The cause of the excess emission.
    - v. The steps being taken to remedy the excess emission.
    - vi. The steps being taken to limit the excess emission in the interim period.
  - b. Written Reporting of Excess Emissions. A written report of an incident of excess emission shall be submitted as a follow-up to all required oral reports to the department within seven days of the onset of the upset condition, and shall include as a minimum the following:
    - i. The identity of the equipment or source operation point from which the excess emission originated and the associated stack or emission point.
    - ii. The estimated quantity of the excess emission.
    - iii. The time and duration of the excess emission.
    - iv. The cause of the excess emission.
    - v. The steps that were taken to remedy and to prevent the recurrence of the incident of excess emission.
    - vi. The steps that were taken to limit the excess emission.
    - vii. If the owner claims that the excess emission was due to malfunction, documentation to support this claim. 567 IAC 24.1(1)-567 IAC 24.1(4)
- 3. Emergency Defense for Excess Emissions. For the purposes of this permit, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include non-compliance, to the extent caused by improperly designed

equipment, lack of preventive maintenance, careless or improper operation or operator error. An emergency constitutes an affirmative defense to an action brought for non-compliance with technology based limitations if it can be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that:

- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. The facility at the time was being properly operated;
- c. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements of the permit; and
- d. The permittee submitted notice of the emergency to the director by certified mail within two working days of the time when the emissions limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. 567 IAC 22.108(16)

# **G15. Permit Deviation Reporting Requirements**

A deviation is any failure to meet a term, condition or applicable requirement in the permit. Reporting requirements for deviations that result in a hazardous release or excess emissions have been indicated above (see G13 and G14). Unless more frequent deviation reporting is specified in the permit, any other deviation shall be documented in the semi-annual monitoring report and the annual compliance certification (see G4 and G5). 567 IAC 22.108(5)"b"

# **G16.** Notification Requirements for Sources That Become Subject to NSPS and NESHAP Regulations

During the term of this permit, the permittee must notify the department of any source that becomes subject to a standard or other requirement under 567-subrule 23.1(2) (standards of performance of new stationary sources) or section 111 of the Act; or 567-subrule 23.1(3) (emissions standards for hazardous air pollutants), 567-subrule 23.1(4) (emission standards for hazardous air pollutants for source categories) or section 112 of the Act. This notification shall be submitted in writing to the department pursuant to the notification requirements in 40 CFR Section 60.7, 40 CFR Section 61.07, and/or 40 CFR Section 63.9. 567 IAC 23.1(2), 567 IAC 23.1(4)

# G17. Requirements for Making Changes to Emission Sources That Do Not Require Title V Permit Modification

- 1. Off Permit Changes to a Source. Pursuant to section 502(b)(10) of the CAAA, the permittee may make changes to this installation/facility without revising this permit if:
  - a. The changes are not major modifications under any provision of any program required by section 110 of the Act, modifications under section 111 of the act, modifications under section 112 of the act, or major modifications as defined in 567 IAC Chapter 22.
  - b. The changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions);
  - c. The changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or as total emissions);
  - d. The changes are not subject to any requirement under Title IV of the Act.
  - e. The changes comply with all applicable requirements.
  - f. For such a change, the permitted source provides to the department and the administrator by certified mail, at least 30 days in advance of the proposed change, a

written notification, including the following, which must be attached to the permit by the source, the department and the administrator:

- i. A brief description of the change within the permitted facility,
- ii. The date on which the change will occur,
- iii. Any change in emission as a result of that change,
- iv. The pollutants emitted subject to the emissions trade
- v. If the emissions trading provisions of the state implementation plan are invoked, then Title V permit requirements with which the source shall comply; a description of how the emissions increases and decreases will comply with the terms and conditions of the Title V permit.
- vi. A description of the trading of emissions increases and decreases for the purpose of complying with a federally enforceable emissions cap as specified in and in compliance with the Title V permit; and
- vii. Any permit term or condition no longer applicable as a result of the change. 567 IAC 22.110(1)
- 2. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements. 567 IAC 22.110(2)
- 3. Notwithstanding any other part of this rule, the director may, upon review of a notice, require a stationary source to apply for a Title V permit if the change does not meet the requirements of subrule 22.110(1). 567 IAC 22.110(3)
- 4. The permit shield provided in subrule 22.108(18) shall not apply to any change made pursuant to this rule. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the state implementation plan authorizing the emissions trade. 567 IAC 22.110(4)
- 5. Aggregate Insignificant Emissions. The permittee shall not construct, establish or operate any new insignificant activities or modify any existing insignificant activities in such a way that the emissions from these activities no longer meet the criteria of aggregate insignificant emissions. If the aggregate insignificant emissions are expected to be exceeded, the permittee shall submit the appropriate permit modification and receive approval prior to making any change. 567 IAC 22.103(2)
- 6. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes, for changes that are provided for in this permit. 567 IAC 22.108(11)

# G18. Duty to Modify a Title V Permit

- 1. Administrative Amendment.
  - a. An administrative permit amendment is a permit revision that is required to do any of the following:
    - i. Correct typographical errors
    - ii. Identify a change in the name, address, or telephone number of any person identified in the permit, or provides a similar minor administrative change at the source:
    - iii. Require more frequent monitoring or reporting by the permittee; or
    - iv. Allow for a change in ownership or operational control of a source where the director determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility,

coverage and liability between the current and new permittee has been submitted to the director.

- b. The permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. The request shall be submitted to the director.
- c. Administrative amendments to portions of permits containing provisions pursuant to Title IV of the Act shall be governed by regulations promulgated by the administrator under Title IV of the Act.

#### 2. Minor Permit Modification.

- a. Minor permit modification procedures may be used only for those permit modifications that do any of the following:
  - i. Do not violate any applicable requirements
  - ii. Do not involve significant changes to existing monitoring, reporting or recordkeeping requirements in the Title V permit.
  - iii. Do not require or change a case by case determination of an emission limitation or other standard, or increment analysis.
  - iv. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include any federally enforceable emissions caps which the source would assume to avoid classification as a modification under any provision under Title I of the Act; and an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Act.;
  - v. Are not modifications under any provision of Title I of the Act; and
  - vi. Are not required to be processed as significant modification.
- b. An application for minor permit revision shall be on the minor Title V modification application form and shall include at least the following:
  - i. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs.
  - ii. The permittee's suggested draft permit
  - iii. Certification by a responsible official, pursuant to 567 IAC 22.107(4), that the proposed modification meets the criteria for use of a minor permit modification procedures and a request that such procedures be used; and
  - iv. Completed forms to enable the department to notify the administrator and the affected states as required by 567 IAC 22.107(7).
- c. The permittee may make the change proposed in its minor permit modification application immediately after it files the application. After the permittee makes this change and until the director takes any of the actions specified in 567 IAC 22.112(4) "a" to "c", the permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time, the permittee need not comply with the existing permit terms and conditions it seeks to modify. However, if the permittee fails to comply with its proposed permit terms and conditions during this time period, existing permit term terms and conditions it seeks to modify may subject the facility to enforcement action.
- 3. Significant Permit Modification. Significant Title V modification procedures shall be used for applications requesting Title V permit modifications that do not qualify as minor Title V

modifications or as administrative amendments. These include but are not limited to all significant changes in monitoring permit terms, every relaxation of reporting or recordkeeping permit terms, and any change in the method of measuring compliance with existing requirements. Significant Title V modifications shall meet all requirements of 567 IAC Chapter 22, including those for applications, public participation, review by affected states, and review by the administrator, and those requirements that apply to Title V issuance and renewal. 567 IAC 22.111-567 IAC 22.113 The permittee shall submit an application for a significant permit modification not later than three months after commencing operation of the changed source unless the existing Title V permit would prohibit such construction or change in operation, in which event the operation of the changed source may not commence until the department revises the permit. 567 IAC 22.105(1)"a"(4)

# **G19.** Duty to Obtain Construction Permits

Unless exempted under 567 IAC 22.1(2), the permittee must not construct, install, reconstruct, or alter any equipment, control equipment or anaerobic lagoon without first obtaining a construction permit, conditional permit, or permit pursuant to 567 IAC 22.8, or permits required pursuant to 567 IAC 22.4 and 567 IAC 22.5. Such permits shall be obtained prior to the initiation of construction, installation or alteration of any portion of the stationary source. 567 IAC 22.1(1) **G20. Asbestos** 

The permittee shall comply with 567 IAC 23.1(3)"a", and 567 IAC 23.2(3)"g" when conducting any renovation or demolition activities at the facility. 567 IAC 23.1(3)"a", and 567 IAC 23.2 **G21. Open Burning** 

The permittee is prohibited from conducting open burning, except as may be allowed by 567 IAC 23.2. 567 IAC 23.2 except 23.2(3)"h"; 567 IAC 23.2(3)"h" - State Only

# G22. Acid Rain (Title IV) Emissions Allowances

The permittee shall not exceed any allowances that it holds under Title IV of the Act or the regulations promulgated there under. Annual emissions of sulfur dioxide in excess of the number of allowances to emit sulfur dioxide held by the owners and operators of the unit or the designated representative of the owners and operators is prohibited. Exceedences of applicable emission rates are prohibited. "Held" in this context refers to both those allowances assigned to the owners and operators by USEPA, and those allowances supplementally acquired by the owners and operators. The use of any allowance prior to the year for which it was allocated is prohibited. Contravention of any other provision of the permit is prohibited. 567 IAC 22.108(7)

# G23. Stratospheric Ozone and Climate Protection (Title VI) Requirements

- 1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a. All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to § 82.106.
  - b. The placement of the required warning statement must comply with the requirements pursuant to § 82.108.
  - c. The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.
  - d. No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.
- 2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.
- d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with reporting and recordkeeping requirements pursuant to § 82.166. ("MVAC-like appliance" as defined at § 82.152)
- e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.
- f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.
- 3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant,
- 5. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. 40 CFR part 82

#### **G24. Permit Reopenings**

- 1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. 567 IAC 22.108(9)"c"
- 2. Additional applicable requirements under the Act become applicable to a major part 70 source with a remaining permit term of 3 or more years. Revisions shall be made as expeditiously as practicable, but not later than 18 months after the promulgation of such standards and regulations.
  - a. Reopening and revision on this ground is <u>not</u> required if the permit has a remaining term of less than three years;
  - b. Reopening and revision on this ground is <u>not</u> required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to 40 CFR 70.4(b)(10)(i) or (ii) as amended to June 25, 1993.
  - c. Reopening and revision on this ground is <u>not</u> required if the additional applicable requirements are implemented in a general permit that is applicable to the source and the

source receives approval for coverage under that general permit. 567 IAC 22.108(17)"a", 567 IAC 22.108(17)"b"

- 3. A permit shall be reopened and revised under any of the following circumstances:
  - a. The department receives notice that the administrator has granted a petition for disapproval of a permit pursuant to 40 CFR 70.8(d) as amended to June 25, 1993, provided that the reopening may be stayed pending judicial review of that determination;
  - b. The department or the administrator determines that the Title V permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Title V permit;
  - c. Additional applicable requirements under the Act become applicable to a Title V source, provided that the reopening on this ground is not required if the permit has a remaining term of less than three years, the effective date of the requirement is later than the date on which the permit is due to expire, or the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. Such a reopening shall be complete not later than 18 months after promulgation of the applicable requirement.
  - d. Additional requirements, including excess emissions requirements, become applicable to a Title IV affected source under the acid rain program. Upon approval by the administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
  - e. The department or the administrator determines that the permit must be revised or revoked to ensure compliance by the source with the applicable requirements. 567 IAC 22.114(1)
- 4. Proceedings to reopen and reissue a Title V permit shall follow the procedures applicable to initial permit issuance and shall effect only those parts of the permit for which cause to reopen exists. 567 IAC 22.114(2)

#### G25. Permit Shield

Compliance with the conditions of this permit shall be deemed compliance with the applicable requirements included in this permit as of the date of permit issuance.

This permit shield shall not alter or affect the following:

- 1. The provisions of section 303 of the Act (emergency orders), including the authority of the administrator under that section:
- 2. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- 3. The applicable requirements of the acid rain program, consistent with section 408(a) of the Act:
- 4. The ability of the department or the administrator to obtain information from the facility pursuant to section 114 of the Act. 567 IAC 22.108 (18)

#### **G26.** Severability

The provisions of this permit are severable and if any provision or application of any provision is found to be invalid by this department or a court of law, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected by such finding. 567 IAC 22.108 (8)

#### **G27. Property Rights**

The permit does not convey any property rights of any sort, or any exclusive privilege. 567 IAC 22.108 (9)"d"

#### **G28.** Transferability

This permit is not transferable from one source to another. If title to the facility or any part of it is transferred, an administrative amendment to the permit must be sought to determine transferability of the permit. 567 IAC 22.111 (1)"d"

#### G29. Disclaimer

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. 567 IAC 22.3(3)"c"

G30. Notification and Reporting Requirements for Stack Tests or Monitor Certification The permittee shall notify the department's stack test contact in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor is performed to determine compliance with an applicable requirement. For the department to consider test results a valid demonstration of compliance with applicable rules or a permit condition, such notice shall be given. Such notice shall include the time, the place, the name of the person who will conduct the test and other information as required by the department. Unless specifically waived by the department's stack test contact, a pretest meeting shall be held not later than 15 days prior to conducting the compliance demonstration. The department may accept a testing protocol in lieu of a pretest meeting. A representative of the department shall be permitted to witness the tests. Results of the tests shall be submitted in writing to the department's stack test contact in the form of a comprehensive report within six weeks of the completion of the testing. Compliance tests conducted pursuant to this permit shall be conducted with the source operating in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which the source shall be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the equipment manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the department that the source has been physically

altered so that capacity cannot be exceeded, or the department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary

Stack test notifications, reports and correspondence shall be sent to:

by the department to determine whether such source is in compliance.

Stack Test Review Coordinator Iowa DNR, Air Quality Bureau 7900 Hickman Road, Suite #1 Urbandale, IA 50322 (515) 242-6001

Within Polk and Linn Counties, stack test notifications, reports and correspondence shall also be directed to the supervisor of the respective county air pollution program. 567 IAC 25.1(7)"a", 567 IAC 25.1(9)

#### G31. Prevention of Air Pollution Emergency Episodes

The permittee shall comply with the provisions of 567 IAC Chapter 26 in the prevention of excessive build-up of air contaminants during air pollution episodes, thereby preventing the occurrence of an emergency due to the effects of these contaminants on the health of persons. 567 IAC 26.1(1)

#### **G32.** Contacts List

The current address and phone number for reports and notifications to the EPA administrator is:

Chief of Air Permits

EPA Region 7

Air Permits and Compliance Branch

901 N. 5<sup>th</sup> Street

Kansas City, KS 66101

(913) 551-7020

The current address and phone number for reports and notifications to the department or the Director is:

Chief, Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite #1 Urbandale, IA 50322 (515) 242-5100

Reports or notifications to the DNR Field Offices or local programs shall be directed to the supervisor at the appropriate field office or local program. Current addresses and phone numbers are:

#### Field Office 1

909 West Main – Suite 4 Manchester, IA 52057 (563) 927-2640

#### Field Office 3

1900 N. Grand Ave. Spencer, IA 51301 (712) 262-4177

#### Field Office 5

401 SW 7<sup>th</sup> Street, Suite I Des Moines, IA 50309 (515) 725-0268

# **Polk County Public Health Dept.**

Air Quality Division 5885 NE 14th St. Des Moines, IA 50313 (515) 286-3351

#### Field Office 2

P.O. Box 1443 2300-15th St., SW Mason City, IA 50401 (641) 424-4073

#### Field Office 4

1401 Sunnyside Lane Atlantic, IA 50022 (712) 243-1934

#### Field Office 6

1004 W. Madison Washington, IA 52353 (319) 653-2135

# **Linn County Public Health Dept.**

Air Quality Division 501 13th St., NW Cedar Rapids, IA 52405 (319) 892-6000